

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
Dallas Division**

<p>CHARLENE CARTER,</p> <p style="text-align: center;">Plaintiff,</p> <p>V.</p> <p>SOUTHWEST AIRLINES CO., AND TRANSPORT WORKERS UNION OF AMERICA, LOCAL 556,</p> <p style="text-align: center;">Defendants.</p>	<p>Civil Case No. 3:17-cv-02278-X</p>
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**DECLARATION OF JASON E. WINFORD IN SUPPORT OF PLAINTIFF'S
PETITION FOR ATTORNEYS' FEES, COSTS, AND EXPENSES**

I, Jason E. Winford, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I submit this declaration in support of Plaintiff Charlene Carter's ("Plaintiff") Petition for Attorneys' Fees, Costs, and Expenses. I have served as Plaintiff's counsel and local counsel in this case since 2017. I have personal knowledge of the matters set forth herein and am competent to give this Declaration.

2. **Education:** I am a 1993 graduate of The University of Texas School of Law. In law school, I served as Articles Editor for the *Review of Litigation*. After law school, I served as a briefing attorney on the Texas Court of Appeals, Eleventh District.

3. **Employment History and Relevant Practice Experience:** I represented Carter as local counsel from August 2017 through June 2022¹ while employed with the law firm of Jenkins

¹ Doc. Nos. 240, 241.

& Watkins, P.C. I have practiced exclusively in the areas of labor and employment law and business litigation since 1994. As an attorney, I have been trial and/or appellate counsel in numerous lawsuits and arbitration proceedings, the vast majority of which have involved labor and employment litigation. I am board-certified in Labor and Employment Law by the Texas Board of Legal Specialization, and have been since 2002. I have been named as a “Texas Super Lawyer” by *Texas Monthly* magazine, and I have also been named to the “Best Lawyers in Dallas Under 40” by *D Magazine*. I have also been a frequent author and speaker on labor and employment matters.

4. **Bar Admissions:** I have been licensed to practice law in the State of Texas since 1993. I am also admitted to practice before the U.S. Court of Appeals for Fifth Circuit, and the U.S. District Courts for the Northern, Southern, Eastern, and Western Districts of Texas.

5. Pursuant to Plaintiff’s request for Attorneys’ Fees and Expenses and the authorities cited therein, Plaintiff claims a total of \$39,611.60² in reasonable, non-redundant, and necessary fees, costs, and expenses that Carter incurred for my work as local counsel in connection with this case from August 2017 through June 2022 while employed with the law firm of Jenkins & Watkins, P.C. In support of Plaintiff’s bill of costs and proof of attorneys’ fees, costs, and expenses, I hereby include **Exhibit 1**, which is a true and correct copy of Jenkins & Watkins’s invoices cataloging the hours that I expended in connection with this matter. The hand-written notations on the invoices were not on the invoices when sent but instead reflect the approval of such invoices by the National Right to Work Legal Defense Foundation. I have not included in the attorneys’ fees sought above any time for timekeepers other than myself. In the exercise of billing judgment, our firm excluded from the bills all time spent by another experienced employment lawyer at

² (\$39,240.00 in reasonable attorneys’ fees + \$371.60 in costs and expenses= \$39,611.60).

Jenkins & Watkins, David Watkins, except for a single time entry. I have excluded from the calculation of attorneys' fees sought that August 29, 2017 time for Mr. Watkins, which reduced the total amount by \$450.

6. With regard to **Exhibit 1**, Jenkins & Watkins's invoices include contemporaneous day-by-day, timekeeper-by-timekeeper entries that provide the amount of time spent on a case-by-case basis, the description of the work done during that time, the timekeeper's rate, and the total amount of fees for that day for that timekeeper. These invoices were created and kept in the course of Jenkins & Watkins's regularly conducted business activity and reflect the reasonable and necessary hours that I expended on this matter. My time is designated on these invoices by the "JW" timekeeper notation. The work I performed for Plaintiff is recorded on a tenth-of-an-hour basis.

7. In formulating my opinion that my hours are reasonable, non-redundant, and necessary, I have considered the *Johnson* factors,³ including, that (a) the time and labor I expended was reasonable and commensurate with the novelty and difficulty of the questions involved, as well as the skill requisite to perform the legal services properly; (b) the fees are reasonable in light of those customarily charged in the locality for similar legal services; (c) the fees are reasonable in light of the amount involved as a result of the controversy and the results obtained; (d) the fees are reasonable in light of the nature and length of the professional relationship between the Plaintiff and me; and (e) the fees are reasonable in light of my experience, reputation, and ability.

8. All time set forth in **Exhibit 1** for which compensation is claimed was reasonably and necessarily expended on this matter.

³ *Johnson v. Georgia Highway Express, Inc.*, 488 F.2d 714 (5th Cir. 1974).

9. As an attorney who regularly practices in the Northern District of Texas, including the Dallas Division, I am aware of and familiar with the prevailing usual and customary rates for attorneys who handle employment-related litigation in this area. My billing rate for this case was \$375 per hour, which is my customary billing rate.⁴ Based on my approximately 20 years' experience and expertise in labor and employment matters, I believe that an hourly rate of \$375 for my time is reasonable and well below the prevailing hourly rates charged by attorneys of similar experience and capabilities handling similar cases in the Dallas market.

10. National Right to Work Legal Defense Foundation, Inc. ("Foundation") attorneys Matthew B. Gilliam, Milton L. Chappell, and Jeffrey D. Jennings, also performed work for which the Foundation seeks compensation here. I am familiar with the skill, experience and expertise of each of these attorneys from having dealt with them while serving as local counsel for the Foundation in multiple lawsuits over the years. Based upon my knowledge of their particular experience and expertise regarding the matters before the Court, it is my belief that the hourly rates set for Mr. Gilliam (\$350), Mr. Chappell (\$400), and Mr. Jennings (\$300), in this petition are reasonable based on those that attorneys with similar experience and backgrounds charge in this district, and based upon the customary rates in the Dallas community. The customary rates in the Dallas community are higher than Mr. Gilliam's, Mr. Chappell's, and Mr. Jennings's for attorneys with their expertise and experience. Gilliam, Chappell, and Jennings are skilled attorneys with significant experience in prosecuting employment law matters and in dealing with the specific issues in this litigation.

⁴ For one entry on 9/15/21, I charged \$150/hour.

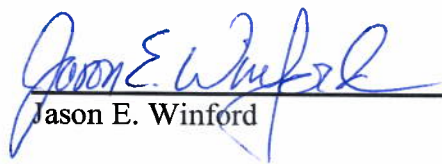
11. All fees charged by Jenkins & Watkins that are sought here have been paid by the Foundation on Carter's behalf.

12. In addition, the Foundation paid Jenkins & Watkins \$371.60 in costs and expenses expended by Jenkins & Watkins on Carter's behalf in this matter as shown on Jenkins & Watkins invoices for September 25, 2017 (\$270.04 service of process fees for service of summons and complaint), July 25, 2018 (\$12.00 parking fee while attending court April 2018 status conference), August 25, 2020 (\$22.28 courier fee for delivery of Carter's in camera brief to Court in connection with Southwest's sanctions motion),⁵ and November 25, 2020 (\$27.28 for courier fees and \$40.00 in witness fees for service of third party deposition subpoena for witness Denise Gutierrez).

13. I have reviewed the Jenkins & Watkins invoices in detail relating to these fees and costs and have determined that the time I expended was reasonable, non-redundant, and necessary, given the nature of this matter, and the prevailing rates in this market.

I swear under penalty of perjury that the foregoing is true and correct.

DATED: December 19, 2022


Jason E. Winford

⁵ Doc. No. 113.

EXHIBIT 1

JENKINS & WATKINS, P.C.

Highland Park West
4300 MacArthur Avenue, Suite 165
Dallas, TX 75209-6524

TAX I.D. #75-1321489

(214) 378-6675

August 25, 2017

Maureen Waller
National Right to Work Legal Defense Foundation
8001 Braddock Rd., Ste. 600
Springfield, VA 22160

Invoice # 26479

RE: Carter, Charlene/Transport Workers Union, Local 556

Current Fees for this Invoice	\$787.50 ✓
Current Expenses for this Invoice	<u>\$0.00</u>
Total Charges for this Invoice	\$787.50 ✓
Previous Balance	\$0.00
Payments/Credits	<u>\$0.00</u>
Total Now Due	<u>\$787.50</u> ✓

*Payment is due upon receipt.
Please reference the Invoice Number on your payment.*

App'd MBH
9/15/17

JENKINS & WATKINS, P.C.

Highland Park West
 4300 MacArthur Avenue, Suite 165
 Dallas, TX 75209-6524

TAX I.D. #75-1321489

(214) 378-6675

August 25, 2017

Maureen Waller
 National Right to Work Legal Defense Foundation
 8001 Braddock Rd., Ste. 600
 Springfield, VA 22160

Invoice # 26479

RE: Carter, Charlene/Transport Workers Union, Local 556

Professional Services:

				<u>Amount</u>	
8/17/2017	JW	Telephone call with Matthew Gilliam regarding claims for lawsuit against TWU Local 556 and Southwest Airlines under the Railway Labor Act.	0.40 \$0.00	\$0.00	✓
8/24/2017	JW	Telephone call with Matthew Gilliam regarding coordination of filing of complaint against Union; forward to Matthew Gilliam forms for use in preparing complaint for filing.	0.40 \$375.00	\$150.00	✓
8/25/2017	JW	Review and comment on draft of complaint against TWU Local 556; multiple correspondence and telephone conferences with Matt Gilliam regarding finalizing complaint and related documents; assist with opening of new civil case and filing of complaint, civil cover sheet, certificate of interested persons, and request for summons; receive and review court notices confirming successful filing of civil case and complaint.	1.70 \$375.00	\$637.50	✓

For professional services rendered	<u>\$787.50</u> ✓
Total New Charges	<u>\$787.50</u> ✓
Previous Balance	\$0.00
Balance Due	<u><u>\$787.50</u></u> ✓

Payment is due upon receipt

JENKINS & WATKINS, P.C.

Highland Park West
4300 MacArthur Avenue, Suite 165
Dallas, TX 75209-6524

TAX I.D. #75-1321489

(214) 378-6675

September 25, 2017

Maureen Waller
National Right to Work Legal Defense Foundation
8001 Braddock Rd., Ste. 600
Springfield, VA 22160

Invoice # 26514

RE: Carter, Charlene/Transport Workers Union, Local 556

Current Fees for this Invoice	\$2,550.00
Current Expenses for this Invoice	<u>\$270.04</u>
Total Charges for this Invoice	\$2,820.04
Previous Balance	\$787.50
Payments/Credits	<u>\$0.00</u>
Total Now Due	<u><u>\$3,607.54</u></u>

Handwritten notes:
MBA App'd 1/10/18
for \$2,370.04
pd 4K 31332

Payment is due upon receipt.
Please reference the Invoice Number on your payment.

JENKINS & WATKINS, P.C.

Highland Park West
 4300 MacArthur Avenue, Suite 165
 Dallas, TX 75209-6524

TAX I.D. #75-1321489

(214) 378-6675

September 25, 2017

Maureen Waller
 National Right to Work Legal Defense Foundation
 8001 Braddock Rd., Ste. 600
 Springfield, VA 22160

Invoice #26514

RE: Carter, Charlene/Transport Workers Union, Local 556

Professional Services:

			<u>Amount</u>	
8/28/2017	JW	Review correspondence and filing notices from clerk regarding abandoned case and regarding issuance of summons; correspondence and telephone call with Matt Gilliams regarding Judge's copy procedures and service of summons; arranged for service of summons on Defendant; review correspondence regarding judge's copy of documents; follow up on status of service and confirm service of process.	1.00 \$375.00	\$375.00 ✓
8/29/2017	DEW	Office conference with Jason Winford; review of controlling case law for necessary party.	1.20 \$375.00	\$450.00 ✓
8/31/2017	DEW	Review of Court filing; office conference with Jason Winford. (No Charge)	0.20 \$375.00	No Charge ✓
8/31/2017	JW	Receive and review executed summons against TWU Local 556.	0.10 \$375.00	\$37.50 ✓

9/05/2017	JW	Receive and review proof of service of summons from process server; email correspondence with Matt Gilliam regarding amending complaint.	0.30 \$375.00	\$112.50 ✓
9/06/2017	JW	Email correspondence with Matt Gilliam regarding filing of amended complaint.	0.10 \$375.00	\$37.50 ✓
9/11/2017	JW	Emails with Matt Gilliam regarding pro hac vice motions and filing of amended complaint; review drafts of pro hac vice documents.	0.30 \$375.00	\$112.50 ✓
9/12/2017	JW	Review and revise draft of first amended complaint; telephone call with Matt Gilliam regarding filing amended complaint and arbitration proceeding.	1.00 \$375.00	\$375.00 ✓
9/13/2017	JW	Receive and review filed pro hac vice applications; email correspondence with Matt Gilliam regarding Judge's copies of filed documents.	0.20 \$375.00	\$75.00 ✓
9/14/2017	DEW	Review of Court filing. (No Charge)	1.20 \$375.00	No Charge ✓
9/14/2017	JW	Receive and review filed first amended complaint, certificate of interested persons, and requests for issuance of summons; telephone calls with Matt Gilliam regarding filings and service; receive and review issued summons and arrange service of summons and amended complaint on defendants.	0.80 \$375.00	\$300.00 ✓
9/15/2017	JW	Receive and review orders granting pro hac vice admissions (.1); receive and review motion to dismiss for failure to state a claim and brief in support, and determine and calendar response due date (.5).	0.60 \$375.00	\$225.00 ✓
9/18/2017	JW	Follow up on service of summons regarding first amended complaint on TWU; email correspondence with Matt Gilliam regarding amended complaint and status of TWU's 12(b)(6) motion to dismiss; review email correspondence with Milton Chappell and with opposing counsel regarding 12(b)(6) motion.	0.60 \$375.00	\$225.00 ✓

9/19/2017	JW	Review correspondence from Southwest regarding arbitration; follow up on status of service of process on Southwest.	0.20 \$375.00	\$75.00 ✓
9/20/2017	JW	Receive and review clerk notice regarding return of service of process on TWU; review correspondence with arbitrator regarding arbitration date and fee.	0.20 \$375.00	\$75.00 ✓
9/21/2017	JW	Review correspondence from arbitrator.	0.10 \$375.00	\$37.50 ✓
9/22/2017	JW	Review email correspondence from arbitrator and from Lisa White of SWA regarding arbitration dates; review correspondence regarding TWU's withdrawal of current 12(b)(6) motion to dismiss and refiling with respect to amended complaint.	0.10 \$375.00	\$37.50 ✓

For professional services rendered\$2,550.00**Expenses**

Fee for process of service

Amount\$270.04 ✓**Total costs**\$270.04

Total New Charges

\$2,820.04

Previous Balance

\$787.50

Balance Due

\$3,607.54***Payment is due upon receipt***

JENKINS & WATKINS, P.C.

Highland Park West
4300 MacArthur Avenue, Suite 165
Dallas, TX 75209-6524

TAX I.D. #75-1321489

(214) 378-6675

October 25, 2017

Maureen Waller
National Right to Work Legal Defense Foundation
8001 Braddock Rd., Ste. 600
Springfield, VA 22160

Invoice #26545

RE: Carter, Charlene/Transport Workers Union, Local 556

Professional Services:

				<u>Amount</u>	
9/27/2017	JW	Receive and review TWU's notice of withdrawal of motion to dismiss original complaint and brief in support.	0.10 \$375.00	\$37.50	✓
10/05/2017	JW	Telephone call from Michele Gehrke regarding extension request for Southwest; email correspondence to Matt Gilliam et al regarding extension request; receive and review Southwest's proposed stipulation and order for extension.	0.40 \$375.00	\$150.00	✓
10/06/2017	DEW	Review of Court filing; office conference with Jason Winford. (No Charge)	0.20 \$375.00	No Charge	✓
10/06/2017	JW	Telephone call with Matt Gilliam regarding Southwest extension request; review email correspondence regarding same; receive and review Southwest's filed motion for extension.	0.30 \$375.00	\$112.50	✓

10/09/2017	DEW	Review of correspondence from interested third party; dictation to Milton Chappell (multiple); review of correspondence from Milton Chappell; review of correspondence from Matt Gilliam; office conference with Jason Winford; review of Court's Electronic Order.	1.00 \$375.00	\$375.00 ✓
10/09/2017	JW	Email correspondence regarding inquiry from potential witness; correspondence with Matt Gilliam regarding same; receive and review court order granting Southwest's response extension.	0.30 \$375.00	\$112.50 ✓
10/10/2017	JW	Review TWU's Motion to Dismiss amended complaint and brief in support.	0.40 \$375.00	\$150.00 ✓
10/11/2017	DEW	Review of Rule 12(b)(6) Motion to Dismiss filed by TWU; review of Memorandum Brief in Support of Motion to Dismiss filed by TWU. (No Charge)	0.20 \$375.00	No Charge ✓
10/17/2017	DEW	Review of Court filing regarding Application for Admission Pro Hac Vice by Southwest Airlines. (No Charge)	0.20 \$375.00	No Charge ✓
10/17/2017	JW	Receive and review Michele Gehrke's motion for admission pro hac vice.	0.10 \$375.00	\$37.50 ✓
10/18/2017	DEW	Review of Court filing. (No Charge)	0.20 \$375.00	No Charge ✓
10/18/2017	JW	Receive and review court order granting pro hac vice application. (No Charge)	0.10 \$375.00	No Charge ✓
10/23/2017	JW	Receive and review Southwest cease and desist letter regarding alleged defamatory social media postings.	0.10 \$375.00	\$37.50 ✓
10/24/2017	DEW	Review of correspondence from Michele Gehrke; review of correspondence from Matt Gilliam; review of Court filings. (No Charge)	0.20 \$375.00	No Charge ✓

10/24/2017	JW	Review and analysis of issues regarding Carter's social media postings and requirements under Texas Defamation Mitigation Act; email correspondence to Matt Gilliam regarding cease and desist letter.	0.50 \$375.00	\$187.50 ✓
10/24/2017	JW	Receive and review Southwest's certificate of interested persons, motion to dismiss, brief in support of motion to dismiss, appendix in support of motion to dismiss, and proposed order; review Southwest's legal arguments in support of motion to dismiss; calculate and docket due date for response to motion to dismiss.	1.30 \$375.00	\$487.50 ✓
For professional services rendered				<u>\$1,687.50</u> ✓
Total New Charges				<u>\$1,687.50</u>
Previous Balance				\$3,607.54
10/04/2017 Payment				\$-787.50
Total Payments and Credits				<u>\$-787.50</u>
Balance Due				<u><u>\$4,507.54</u></u>

Payment is due upon receipt

JENKINS & WATKINS, P.C.

Highland Park West
4300 MacArthur Avenue, Suite 165
Dallas, TX 75209-6524

TAX I.D. #75-1321489

(214) 378-6675

November 25, 2017

Maureen Waller
National Right to Work Legal Defense Foundation
8001 Braddock Rd., Ste. 600
Springfield, VA 22160

Invoice #26577

RE: Carter, Charlene/Transport Workers Union, Local 556

Professional Services:

				<u>Amount</u>	
10/27/2017	JW	Email correspondence with Matt Gilliam regarding status of response to TWU Local 556's motion to dismiss. (No Charge)	0.10 \$375.00	No Charge	✓
10/31/2017	JW	Review and revise draft of response and brief in support of response; prepare redline of suggested changes to response brief; email correspondence and telephone call with Matt Gilliam to discuss response and brief and suggested revisions.	1.80 \$375.00	\$675.00	✓
11/01/2017	DEW	Review of Plaintiff's Response to Defendant's 12(b)(6) Motion to Dismiss. (No Charge)	0.20 \$375.00	No Charge	✓
11/01/2017	JW	Review final filed copy of response to Local 556's motion to dismiss and our brief in support; docket Local 556's reply deadline; email correspondence with Matt Gilliam regarding judge's copy.	0.40 \$375.00	\$150.00	✓

11/14/2017	JW	Review and provide redline revisions to draft of response to Southwest's motion to dismiss and brief in support; email correspondence and telephone conference with Matt Gilliam regarding comments on legal arguments for response brief and filing procedures.	3.20 \$375.00	\$1,200.00 ✓
11/15/2017	DEW	Review of Court filings by Carter in response to Rule 12 (b)(6) Motion to Dismiss filed by Transport Workers Union. (No Charge)	0.20 \$375.00	No Charge ✓
11/15/2017	JW	Receive and review filed response and brief in support and docket reply due date; receive and review Local 556's reply brief in support of motion to dismiss; email correspondence with Matt Gilliam regarding same.	0.80 \$375.00	\$300.00 ✓
For professional services rendered				<u>\$2,325.00</u> ✓
Total New Charges				<u>\$2,325.00</u>
Previous Balance				\$4,507.54
Balance Due				<u><u>\$6,832.54</u></u>

Payment is due upon receipt

JENKINS & WATKINS, P.C.

Highland Park West
4300 MacArthur Avenue, Suite 165
Dallas, TX 75209-6524

TAX I.D. #75-1321489

(214) 378-6675

November 25, 2017

Maureen Waller
National Right to Work Legal Defense Foundation
8001 Braddock Rd., Ste. 600
Springfield, VA 22160

Invoice # 26577

RE: Carter, Charlene/Transport Workers Union, Local 556

Current Fees for this Invoice	\$2,325.00
Current Expenses for this Invoice	<u>\$0.00</u>
Total Charges for this Invoice	\$2,325.00 ✓
Previous Balance	\$4,507.54
Payments/Credits	<u>\$0.00</u>
Total Now Due	<u>\$6,832.54</u>

App'd by
MBH
12/22

Payment is due upon receipt.
Please reference the Invoice Number on your payment.

JENKINS & WATKINS, P.C.

Highland Park West
4300 MacArthur Avenue, Suite 165
Dallas, TX 75209-6524

TAX I.D. #75-1321489

(214) 378-6675

October 25, 2017

Maureen Waller
National Right to Work Legal Defense Foundation
8001 Braddock Rd., Ste. 600
Springfield, VA 22160

Invoice # 26545

RE: Carter, Charlene/Transport Workers Union, Local 556

Current Fees for this Invoice	\$1,687.50
Current Expenses for this Invoice	<u>\$0.00</u>
Total Charges for this Invoice	\$1,687.50 ✓
Previous Balance	\$3,607.54
Payments/Credits	<u>\$-787.50</u> 12/22
Total Now Due	<u><u>\$4,507.54</u></u>

*Payment is due upon receipt.
Please reference the Invoice Number on your payment.*

JENKINS & WATKINS, P.C.

Highland Park West
4300 MacArthur Avenue, Suite 165
Dallas, TX 75209-6524

TAX I.D. #75-1321489

(214) 378-6675

December 25, 2017

Maureen Waller
National Right to Work Legal Defense Foundation
8001 Braddock Rd., Ste. 600
Springfield, VA 22160

Invoice # 26605

RE: Carter, Charlene/Transport Workers Union, Local 556

Current Fees for this Invoice	\$262.50
Current Expenses for this Invoice	\$0.00
Total Charges for this Invoice	\$262.50 ✓
Previous Balance	\$6,832.54
Payments/Credits	\$-450.00
Total Now Due	<u>\$6,645.04</u>

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1460
31460

Payment is due upon receipt.
Please reference the Invoice Number on your payment.

JENKINS & WATKINS, P.C.

Highland Park West
4300 MacArthur Avenue, Suite 165
Dallas, TX 75209-6524

TAX I.D. #75-1321489

(214) 378-6675

December 25, 2017

Maureen Waller
National Right to Work Legal Defense Foundation
8001 Braddock Rd., Ste. 600
Springfield, VA 22160

Invoice #26605

RE: Carter, Charlene/Transport Workers Union, Local 556

Professional Services:

			Amount	
11/29/2017	DEW	Review of Southwest Airlines Reply Brief. (No Charge)	0.20 \$375.00	No Charge ✓
11/29/2017	JW	Review and analyze Southwest's reply brief in support of motion to dismiss; review status of lawsuit and of grievance arbitration.	0.60 \$375.00	\$225.00 ✓
12/01/2017	JW	Correspondence with Jeff Jennings regarding process service.	0.10 \$375.00	\$37.50 ✓
12/12/2017	JW	Email correspondence with Jeff Jennings regarding update status of grievance arbitration. (No Charge)	0.20 \$375.00	No Charge ✓

For professional services rendered

\$262.50

Total New Charges

\$262.50

Previous Balance	\$6,832.54
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12/22/2017 Credit	\$-450.00
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Credit for billing entry 8/29/2017 for \$450.00 - Inv. 26514.

Total Payments and Credits	\$-450.00
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Balance Due	\$6,645.04
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Payment is due upon receipt

JENKINS & WATKINS, P.C.

Highland Park West
4300 MacArthur Avenue, Suite 165
Dallas, TX 75209-6524

TAX I.D. #75-1321489

(214) 378-6675

June 25, 2018

Maureen Waller
National Right to Work Legal Defense Foundation
8001 Braddock Rd., Ste. 600
Springfield, VA 22160

Invoice # 26820

RE: Carter, Charlene/Transport Workers Union, Local 556

Current Fees for this Invoice	\$862.50
Current Expenses for this Invoice	<u>\$0.00</u>
Total Charges for this Invoice	\$862.50 ✓
Previous Balance	\$-193.64 ✓
Payments/Credits	<u>\$0.00</u>
Total Now Due	<u>\$668.86</u> ✓

Payment is due upon receipt.
Please reference the Invoice Number on your payment.

App'd by
MBH
7/9/18

JENKINS & WATKINS, P.C.

Highland Park West
 4300 MacArthur Avenue, Suite 165
 Dallas, TX 75209-6524

TAX I.D. #75-1321489

(214) 378-6675

June 25, 2018

Maureen Waller
 National Right to Work Legal Defense Foundation
 8001 Braddock Rd., Ste. 600
 Springfield, VA 22160

Invoice # 26820

RE: Carter, Charlene/Transport Workers Union, Local 556

Professional Services:

				<u>Amount</u>	
6/11/2018	JW	Review email correspondence from SWA counsel regarding motion for leave to file amended complaint.	0.10 \$375.00	\$37.50	✓
6/12/2018	JW	Review email correspondence from Michele Gherke and Matt Gilliam regarding status of amended pleadings.	0.10 \$375.00	\$37.50	✓
6/13/2018	JW	Receive and review correspondence from plaintiff's counsel to court.	0.10 \$375.00	\$37.50	✓
6/15/2018	JW	Telephone conference with Matt Gilliam regarding motion for leave to amend complaint.	0.20 \$375.00	\$75.00	✓
6/18/2018	JW	Review draft motion for leave to file amended complaint and proposed order, along with proposed second amended complaint; email correspondence with Matt Gilliam with comments regarding motion and order.	0.70 \$375.00	\$262.50	✓

6/19/2018	JW	Telephone calls with Matt Gilliam regarding strategy for motion for leave to amend complaint to add Title VII claim and potential alternatives; review draft stipulation for filing of amended complaint.	0.40 \$375.00	\$150.00 ✓
6/22/2018	JW	Telephone calls with Matt Gilliam regarding filing of Title VII claim and motion for leave to amend complaint.	0.20 \$375.00	\$75.00 ✓
6/25/2018	JW	Receive and review Stipulation for file amended complaint and filed amended complaint; calculate and docket Defendants' response date; email correspondence with Matt Gilliam regarding filing of amended complaint.	0.50 \$375.00	\$187.50 ✓
For professional services rendered				<u>\$862.50</u> ✓
Total New Charges				<u>\$862.50</u> ✓
Previous Balance				<u>\$-193.64</u> ✓
Balance Due				<u><u>\$668.86</u></u> ✓

Payment is due upon receipt

JENKINS & WATKINS, P.C.

Highland Park West
4300 MacArthur Avenue, Suite 165
Dallas, TX 75209-6524

TAX I.D. #75-1321489

(214) 378-6675

July 25, 2018

Maureen Waller
National Right to Work Legal Defense Foundation
8001 Braddock Rd., Ste. 600
Springfield, VA 22160

Invoice # 26851

RE: Carter, Charlene/Transport Workers Union, Local 556

Current Fees for this Invoice	\$675.00
Current Expenses for this Invoice	<u>\$12.00</u>
Total Charges for this Invoice	\$687.00
 Previous Balance	 \$668.86
Payments/Credits	<u>\$-668.86</u>
 Total Now Due	 <u><u>\$687.00</u></u> ✓

Payment is due upon receipt.
Please reference the Invoice Number on your payment.

App'd by
MBA
8/10/18

JENKINS & WATKINS, P.C.

Highland Park West
 4300 MacArthur Avenue, Suite 165
 Dallas, TX 75209-6524

TAX I.D. #75-1321489

(214) 378-6675

July 25, 2018

Maureen Waller
 National Right to Work Legal Defense Foundation
 8001 Braddock Rd., Ste. 600
 Springfield, VA 22160

Invoice #26851

RE: Carter, Charlene/Transport Workers Union, Local 556

Professional Services:

				<u>Amount</u>	
7/10/2018	JW	Receive and review Southwest's motion to dismiss second amended complaint, brief in support, and appendix in support, and determine and calendar response due date; receive and review Southwest's correspondence to court with proposed order on motion to dismiss.	1.00 \$375.00	\$375.00	✓
7/11/2018	JW	Receive and review TWU's motion to dismiss first amended complaint, and determine and calendar response due date.	0.40 \$375.00	\$150.00	✓
7/13/2018	JW	Correspondence with Matthew Gilliam and Milton Chappell regarding responses to motions to dismiss.	0.40 \$375.00	\$150.00	✓
For professional services rendered				<u>\$675.00</u>	

ExpensesAmount

Parking	\$12.00 ✓
Total costs	<u>\$12.00</u>
Total New Charges	<u>\$687.00</u> ✓
Previous Balance	\$668.86
7/24/2018 Payment	\$-668.86
Total Payments and Credits	<u>\$-668.86</u>
Balance Due	<u><u>\$687.00</u></u> ✓

Payment is due upon receipt

JENKINS & WATKINS, P.C.

Highland Park West
4300 MacArthur Avenue, Suite 165
Dallas, TX 75209-6524

TAX I.D. #75-1321489

(214) 378-6675

August 25, 2018

Maureen Waller
National Right to Work Legal Defense Foundation
8001 Braddock Rd., Ste. 600
Springfield, VA 22160

Invoice # 26882

RE: Carter, Charlene/Transport Workers Union, Local 556

Current Fees for this Invoice	\$1,650.00 ✓
Current Expenses for this Invoice	<u>\$0.00 ✓</u>
Total Charges for this Invoice	\$1,650.00 ✓
 Previous Balance	 \$687.00 ✓
Payments/Credits	<u>\$-687.00 ✓</u>
 Total Now Due	 <u>\$1,650.00 ✓</u>

Payment is due upon receipt.
Please reference the Invoice Number on your payment.

App'd MBX
10/3/18

JENKINS & WATKINS, P.C.

Highland Park West
 4300 MacArthur Avenue, Suite 165
 Dallas, TX 75209-6524

TAX I.D. #75-1321489

(214) 378-6675

August 25, 2018

Maureen Waller
 National Right to Work Legal Defense Foundation
 8001 Braddock Rd., Ste. 600
 Springfield, VA 22160

Invoice # 26882

RE: Carter, Charlene/Transport Workers Union, Local 556

Professional Services:

				<u>Amount</u>	
7/30/2018	JW	Review and revise brief in response to SWA's motion to dismiss; telephone call and email correspondence with Matt Gilliam regarding brief.	1.30 \$375.00	\$487.50	✓
7/31/2018	JW	Receive and review filed copy of response to SWA's motion to dismiss and brief in support.	0.30 \$375.00	\$112.50	✓
8/01/2018	JW	Review and revise brief in response to TWU Local 556's motion to dismiss, and communication with co-counsel regarding suggested revisions.	1.20 \$375.00	\$450.00	✓
8/02/2018	JW	Receive and review filed copy of Plaintiff's Response to TWU's Motion to Dismiss, and Brief in Support of Response.	0.20 \$375.00	\$75.00	✓
8/14/2018	JW	Receive and review SWA's reply brief in support of motion to dismiss; Receive and review TWU's reply brief in support of motion to dismiss.	0.60 \$375.00	\$225.00	✓

8/15/2018	JW	Review multiple email correspondence with SWA counsel regarding scheduling of hearing on motion to dismiss.	0.20 \$375.00	\$75.00 ✓
8/16/2018	JW	Review correspondence with counsel regarding hearing on motions to dismiss.	0.00 \$375.00	\$0.00 ✓
8/20/2018	JW	Review multiple email correspondence among counsel regarding scheduling of hearing on pending motions.	0.40 \$375.00	\$150.00 ✓
8/23/2018	JW	Review correspondence among counsel regarding scheduling hearing on motion to dismiss.	0.20 \$375.00	\$75.00 ✓
For professional services rendered				<u>\$1,650.00</u> ✓
Total New Charges				<u>\$1,650.00</u> ✓
Previous Balance				\$687.00 ✓
8/22/2018 Payment				\$-687.00 ✓
Total Payments and Credits				<u>\$-687.00</u> ✓
Balance Due				<u><u>\$1,650.00</u></u> ✓

Payment is due upon receipt

JENKINS & WATKINS, P.C.

Highland Park West
4300 MacArthur Avenue, Suite 165
Dallas, TX 75209-6524

TAX I.D. #75-1321489

(214) 378-6675

September 25, 2018

Maureen Waller
National Right to Work Legal Defense Foundation
8001 Braddock Rd., Ste. 600
Springfield, VA 22160

Invoice # 26910

RE: Carter, Charlene/Transport Workers Union, Local 556

Current Fees for this Invoice	\$37.50 ✓
Current Expenses for this Invoice	<u>\$0.00</u>
Total Charges for this Invoice	\$37.50 ✓
Previous Balance	\$1,650.00
Payments/Credits	<u>\$0.00</u>
Total Now Due	<u>\$1,687.50</u>

Payment is due upon receipt.
Please reference the Invoice Number on your payment.

Already
App'd
by
MBH

App'd by
MBH
10/26/18
to pay
\$ 37.50
only

JENKINS & WATKINS, P.C.

Highland Park West
4300 MacArthur Avenue, Suite 165
Dallas, TX 75209-6524

TAX I.D. #75-1321489

(214) 378-6675

September 25, 2018

Maureen Waller
National Right to Work Legal Defense Foundation
8001 Braddock Rd., Ste. 600
Springfield, VA 22160

Invoice # 26910

RE: Carter, Charlene/Transport Workers Union, Local 556

Professional Services:

			<u>Amount</u>	
8/27/2018	JW	Review email correspondence from opposing counsel regarding status of hearing on motions to dismiss.	0.10 \$375.00	<u>\$37.50</u> ✓

For professional services rendered

	<u>\$37.50</u> ✓
Total New Charges	<u>\$37.50</u> ✓
Previous Balance	\$1,650.00
Balance Due	<u><u>\$1,687.50</u></u>

Payment is due upon receipt

JENKINS & WATKINS, P.C.

Highland Park West
4300 MacArthur Avenue, Suite 165
Dallas, TX 75209-6524

TAX I.D. #75-1321489

(214) 378-6675

September 25, 2018

Maureen Waller
National Right to Work Legal Defense Foundation
8001 Braddock Rd., Ste. 600
Springfield, VA 22160

Invoice # 26910

RE: Carter, Charlene/Transport Workers Union, Local 556

Current Fees for this Invoice	\$37.50 ✓
Current Expenses for this Invoice	<u>\$0.00</u>
Total Charges for this Invoice	\$37.50 ✓
Previous Balance	\$1,650.00
Payments/Credits	<u>\$0.00</u>
Total Now Due	<u>\$1,687.50</u>

Payment is due upon receipt.
Please reference the Invoice Number on your payment.

Already
App'd
by
MBH

App'd by
MBH
10/26/18
to pay
\$ 37.50
only

JENKINS & WATKINS, P.C.

Highland Park West
4300 MacArthur Avenue, Suite 165
Dallas, TX 75209-6524

TAX I.D. #75-1321489

(214) 378-6675

September 25, 2018

Maureen Waller
National Right to Work Legal Defense Foundation
8001 Braddock Rd., Ste. 600
Springfield, VA 22160

Invoice # 26910

RE: Carter, Charlene/Transport Workers Union, Local 556

Professional Services:

			<u>Amount</u>	
8/27/2018	JW	Review email correspondence from opposing counsel regarding status of hearing on motions to dismiss.	0.10 \$375.00	<u>\$37.50</u> ✓

For professional services rendered

Total New Charges	<u>\$37.50</u> ✓
Previous Balance	<u>\$37.50</u> ✓
Balance Due	<u><u>\$1,687.50</u></u>

Payment is due upon receipt

JENKINS & WATKINS, P.C.

Highland Park West
4300 MacArthur Avenue, Suite 165
Dallas, TX 75209-6524

TAX I.D. #75-1321489

(214) 378-6675

September 25, 2018

Maureen Waller
National Right to Work Legal Defense Foundation
8001 Braddock Rd., Ste. 600
Springfield, VA 22160

Invoice # 26910

RE: Carter, Charlene/Transport Workers Union, Local 556

Current Fees for this Invoice	\$37.50 ✓
Current Expenses for this Invoice	<u>\$0.00</u>
Total Charges for this Invoice	\$37.50 ✓
Previous Balance	\$1,650.00
Payments/Credits	<u>\$0.00</u>
Total Now Due	<u>\$1,687.50</u>

Payment is due upon receipt.
Please reference the Invoice Number on your payment.

Already
Appd
by
MBH

Appd by
MBH
10/26/18
to pay
\$ 37.50
only

JENKINS & WATKINS, P.C.

Highland Park West
4300 MacArthur Avenue, Suite 165
Dallas, TX 75209-6524

TAX I.D. #75-1321489

(214) 378-6675

September 25, 2018

Maureen Waller
National Right to Work Legal Defense Foundation
8001 Braddock Rd., Ste. 600
Springfield, VA 22160

Invoice # 26910

RE: Carter, Charlene/Transport Workers Union, Local 556

Professional Services:

			<u>Amount</u>	
8/27/2018	JW	Review email correspondence from opposing counsel regarding status of hearing on motions to dismiss.	0.10	<u>\$37.50</u> ✓
			\$375.00	

For professional services rendered

\$37.50 ✓

Total New Charges

\$37.50 ✓

Previous Balance

\$1,650.00

Balance Due

\$1,687.50

Payment is due upon receipt

JENKINS & WATKINS, P.C.

Highland Park West
4300 MacArthur Avenue, Suite 165
Dallas, TX 75209-6524

TAX I.D. #75-1321489

(214) 378-6675

October 25, 2018

Maureen Waller
National Right to Work Legal Defense Foundation
8001 Braddock Rd., Ste. 600
Springfield, VA 22160

Invoice # 26942

RE: Carter, Charlene/Transport Workers Union, Local 556

Current Fees for this Invoice	\$412.50
Current Expenses for this Invoice	<u>\$0.00</u>
Total Charges for this Invoice	\$412.50
Previous Balance	\$1,687.50
Payments/Credits	<u>\$-1,650.00</u>
Total Now Due	<u>\$450.00</u>

*Payment is due upon receipt.
Please reference the Invoice Number on your payment.*

✓
App'd by
MAY
11/9/18
for
\$412.50
-Remaining
balance
of \$375.00
should have
already
been
processed.
Please
verify
MAY

JENKINS & WATKINS, P.C.

Highland Park West
 4300 MacArthur Avenue, Suite 165
 Dallas, TX 75209-6524

TAX I.D. #75-1321489

(214) 378-6675

October 25, 2018

Maureen Waller
 National Right to Work Legal Defense Foundation
 8001 Braddock Rd., Ste. 600
 Springfield, VA 22160

Invoice # 26942

RE: Carter, Charlene/Transport Workers Union, Local 556

Professional Services:

				<u>Amount</u>	
10/09/2018	JW	Receive and review court order scheduling hearing on pending motions to dismiss and docket same; review multiple email correspondence among all counsel regarding rescheduling of hearing.	0.30 \$375.00	\$112.50	✓
10/10/2018	JW	Review email correspondence regarding rescheduling of hearing.	0.10 \$375.00	\$37.50	✓
10/11/2018	JW	Receive and review court order resetting hearing on pending motions to October 29.	0.10 \$375.00	\$37.50	✓
10/16/2018	JW	Receive and review order resetting motion hearing.	0.10 \$375.00	\$37.50	✓
10/17/2018	JW	Review correspondence from counsel regarding hearing reset.	0.10 \$375.00	\$37.50	✓

10/19/2018	JW	Review correspondence from counsel regarding rescheduling motion hearing.	0.10 \$375.00	\$37.50 ✓
10/22/2018	JW	Review multiple correspondence among counsel and court regarding resetting date for motion hearing; receive and review court order resetting date.	0.30 \$375.00	\$112.50 ✓
For professional services rendered				<u>\$412.50</u> ✓
Total New Charges				<u>\$412.50</u> ✓
Previous Balance				\$1,687.50
10/19/2018 Payment				\$-1,650.00
Total Payments and Credits				<u>\$-1,650.00</u>
Balance Due				<u><u>\$450.00</u></u>

Payment is due upon receipt

JENKINS & WATKINS, P.C.

Highland Park West
 4300 MacArthur Avenue, Suite 165
 Dallas, TX 75209-6524

TAX I.D. #75-1321489

(214) 378-6675

December 25, 2018

Maureen Waller
 National Right to Work Legal Defense Foundation
 8001 Braddock Rd., Ste. 600
 Springfield, VA 22160

Invoice #26993

RE: Carter, Charlene/Transport Workers Union, Local 556

Professional Services:

				<u>Amount</u>	
12/12/2018	JW	Email correspondence with opposing counsel and co-counsel regarding Southwest's motion to withdraw and substitute counsel.	0.10	\$37.50	✓
			\$375.00		
12/13/2018	JW	Receive and review unopposed motion for substitution of counsel for Southwest.	0.10	\$37.50	✓
			\$375.00		
12/21/2018	JW	Receive and review court minute entry regarding hearing on motions to dismiss.	0.10	\$37.50	✓
			\$375.00		

For professional services rendered\$112.50 ✓

Total New Charges

\$112.50

Previous Balance

\$0.00

Balance Due

\$112.50

JENKINS & WATKINS, P.C.

Highland Park West
4300 MacArthur Avenue, Suite 165
Dallas, TX 75209-6524

TAX I.D. #75-1321489

(214) 378-6675

January 25, 2019

Maureen Waller
National Right to Work Legal Defense Foundation
8001 Braddock Rd., Ste. 600
Springfield, VA 22160

Invoice # 27020

RE: Carter, Charlene/Transport Workers Union, Local 556

Current Fees for this Invoice	\$750.00
Current Expenses for this Invoice	<u>\$0.00</u>
Total Charges for this Invoice	\$750.00
Previous Balance	\$112.50
Payments/Credits	<u>\$0.00</u>
Total Now Due	<u><u>\$862.50</u></u>

✓
App'd
MB
2/19/19

Payment is due upon receipt.
Please reference the Invoice Number on your payment.

JENKINS & WATKINS, P.C.

Highland Park West
4300 MacArthur Avenue, Suite 165
Dallas, TX 75209-6524

TAX I.D. #75-1321489

(214) 378-6675

January 25, 2019

Maureen Waller
National Right to Work Legal Defense Foundation
8001 Braddock Rd., Ste. 600
Springfield, VA 22160

Invoice #27020

RE: Carter, Charlene/Transport Workers Union, Local 556

Professional Services:

				<u>Amount</u>	
1/02/2019	JW	Correspondence with Matt Gilliam with detailed comments regarding mediator selection.	0.50 \$375.00	\$187.50	✓
1/03/2019	JW	Review correspondence with counsel regarding revised scheduling order.	0.10 \$375.00	\$37.50	✓
1/07/2019	JW	Review proposed revised scheduling order and correspondence with Matt Gilliam regarding same; correspondence with Matt Gilliam regarding mediators.	0.50 \$375.00	\$187.50	✓
1/09/2019	JW	Receive and review Southwest's revisions and comments to proposed revised scheduling order; telephone conference with Matt Gilliam regarding mediation and scheduling order.	0.40 \$375.00	\$150.00	✓
1/10/2019	JW	Review changes to proposed revised scheduling order and multiple correspondence regarding same; receive and review filed copy of proposed revised scheduling order.	0.40 \$375.00	\$150.00	✓

1/14/2019 JW Review email correspondence with counsel and court
regarding proposed scheduling order.

0.10
\$375.00

\$37.50 ✓

For professional services rendered

\$750.00

Total New Charges

\$750.00

Previous Balance

\$112.50

Balance Due

\$862.50

Payment is due upon receipt

JENKINS & WATKINS, P.C.

Highland Park West
4300 MacArthur Avenue, Suite 165
Dallas, TX 75209-6524

TAX I.D. #75-1321489

(214) 378-6675

February 25, 2019

Maureen Waller
National Right to Work Legal Defense Foundation
8001 Braddock Rd., Ste. 600
Springfield, VA 22160

Invoice # 27053

RE: Carter, Charlene/Transport Workers Union, Local 556

Current Fees for this Invoice	\$337.50
Current Expenses for this Invoice	<u>\$0.00</u>
Total Charges for this Invoice	<u>\$337.50</u>
Previous Balance	\$862.50
Payments/Credits	<u>\$0.00</u>
Total Now Due	<u><u>\$1,200.00</u></u>

*Payment is due upon receipt.
Please reference the Invoice Number on your payment.*

JENKINS & WATKINS, P.C.

Highland Park West
4300 MacArthur Avenue, Suite 165
Dallas, TX 75209-6524

TAX I.D. #75-1321489

(214) 378-6675

February 25, 2019

Maureen Waller
National Right to Work Legal Defense Foundation
8001 Braddock Rd., Ste. 600
Springfield, VA 22160

Invoice #27053

RE: Carter, Charlene/Transport Workers Union, Local 556

Professional Services:

				<u>Amount</u>	
2/01/2019	JW	Review court memorandum opinion and order on motions to dismiss; receive and review court's revised scheduling order and trial setting, and mediation order.	0.80 \$375.00	\$300.00	✓
2/04/2019	JW	Receive and review mediation details from mediator's office.	0.10 \$375.00	\$37.50	✓
For professional services rendered				<u>\$337.50</u>	✓
Total New Charges				<u>\$337.50</u>	✓
Previous Balance				\$862.50	
Balance Due				<u><u>\$1,200.00</u></u>	

Payment is due upon receipt

JENKINS & WATKINS, P.C.

Highland Park West
4300 MacArthur Avenue, Suite 165
Dallas, TX 75209-6524

TAX I.D. #75-1321489

(214) 378-6675

March 25, 2019

Maureen Waller
National Right to Work Legal Defense Foundation
8001 Braddock Rd., Ste. 600
Springfield, VA 22160

Invoice # 27091

RE: Carter, Charlene/Transport Workers Union, Local 556

Current Fees for this Invoice	\$1,912.50 ✓
Current Expenses for this Invoice	<u>\$0.00</u> ✓
Total Charges for this Invoice	\$1,912.50 ✓
Previous Balance	\$1,200.00
Payments/Credits	<u>\$-1,200.00</u>
Total Now Due	<u><u>\$1,912.50</u></u>

*Payment is due upon receipt.
Please reference the Invoice Number on your payment.*

APR 5/3/19 MBH

JENKINS & WATKINS, P.C.

Highland Park West
 4300 MacArthur Avenue, Suite 165
 Dallas, TX 75209-6524

TAX I.D. #75-1321489

(214) 378-6675

March 25, 2019

Maureen Waller
 National Right to Work Legal Defense Foundation
 8001 Braddock Rd., Ste. 600
 Springfield, VA 22160

Invoice #27091

RE: Carter, Charlene/Transport Workers Union, Local 556

Professional Services:

				<u>Amount</u>	
2/27/2019	JW	Telephone conference with Matt Gilliam regarding filing of third amended complaint and other next steps.	0.30 \$375.00	\$112.50	✓
2/28/2019	JW	Review redlined and clean draft of third amended complaint and make note of suggested revisions and changes.	1.00 \$375.00	\$375.00	✓
3/01/2019	JW	Prepare redline of revisions to third amended complaint for Matthew Gilliam's review; receive and review filed third amended complaint.	0.70 \$375.00	\$262.50	✓
3/07/2019	JW	Correspondence with counsel regarding Plaintiff's third amended complaint as to dismissed claims; review current 5th Circuit case law on dismissed claims in amended complaints.	0.60 \$375.00	\$225.00	✓

3/12/2019	JW	Email correspondence with Matt Gilliam regarding third amended complaint; review proposed joint stipulation.	0.30 \$375.00	\$112.50 ✓
3/13/2019	JW	Multiple correspondence among counsel regarding third amended complaint, proposed joint stipulation, and Defendants' intended motion to strike and our strategy for responding.	0.60 \$375.00	\$225.00 ✓
3/14/2019	JW	Review draft of notice to court regarding third amended complaint.	0.20 \$375.00	\$75.00 ✓
3/15/2019	JW	Correspondence with Matt Gilliam regarding comments on notice to court regarding third amended complaint; review revised notice to court; receive and review Defendants' joint motion to strike third amended complaint.	0.60 \$375.00	\$225.00 ✓
3/17/2019	JW	Review draft brief in response to joint motion to strike.	0.30 \$375.00	\$112.50 ✓
3/18/2019	JW	Review filed response to motion to strike third amended complaint and related correspondence with counsel.	0.30 \$375.00	\$112.50 ✓
3/22/2019	JW	Correspondence with Matt Gilliam regarding transcript order procedures; receive and review clerk notice for filing of transcript.	0.20 \$375.00	\$75.00 ✓
For professional services rendered				<hr/> \$1,912.50 ✓
Total New Charges				<hr/> \$1,912.50
Previous Balance				\$1,200.00
3/06/2019	Payment			\$-112.50
3/06/2019	Payment			\$-750.00

3/25/2019 Payment	\$-337.50
Total Payments and Credits	<u>\$-1,200.00</u>
Balance Due	<u><u>\$1,912.50</u></u>

Payment is due upon receipt

JENKINS & WATKINS, P.C.

Highland Park West
4300 MacArthur Avenue, Suite 165
Dallas, TX 75209-6524

TAX I.D. #75-1321489

(214) 378-6675

April 25, 2019

Maureen Waller
National Right to Work Legal Defense Foundation
8001 Braddock Rd., Ste. 600
Springfield, VA 22160

Invoice # 27126

RE: Carter, Charlene/Transport Workers Union, Local 556

Current Fees for this Invoice

\$1,387.50

Current Expenses for this Invoice

\$0.00

Total Charges for this Invoice

\$1,387.50

Previous Balance

\$1,912.50

Payments/Credits

\$0.00

Total Now Due

\$3,300.00

*Payment is due upon receipt.
Please reference the Invoice Number on your payment.*

6/17/19
App's to
pay this
amount
NBT

pd. ck 52301 - previously
app's

JENKINS & WATKINS, P.C.

Highland Park West
4300 MacArthur Avenue, Suite 165
Dallas, TX 75209-6524

TAX I.D. #75-1321489

(214) 378-6675

April 25, 2019

Maureen Waller
National Right to Work Legal Defense Foundation
8001 Braddock Rd., Ste. 600
Springfield, VA 22160

Invoice #27126

RE: Carter, Charlene/Transport Workers Union, Local 556

Professional Services:

				<u>Amount</u>	
3/29/2019	JW	Review Defendants' reply in support of motion to strike third amended petition (.2); multiple telephone calls and email correspondence with Matt Gilliam regarding sur-reply (.7); review revisions and comments to initial disclosures (.1).	1.00 \$375.00	\$375.00	✓
4/01/2019	JW	Review Southwest initial disclosures; review final served initial disclosures for Plaintiff; review filed notice of corrected citation; review correspondence with Local 556 counsel regarding status of initial disclosures; review Local 556's disclosures.	0.50 \$375.00	\$187.50	✓
4/03/2019	JW	Receive and review court order striking 3rd amended complaint; correspondence with Matt Gilliam regarding filing of 4th amended complaint..	0.30 \$375.00	\$112.50	✓
4/08/2019	JW	Review draft of fourth amended complaint and correspondence with Matthew Gilliam regarding same.	0.40 \$375.00	\$150.00	✓

4/09/2019	JW	Review revised draft of fourth amended complaint.	0.20 \$375.00	\$75.00 ✓
4/10/2019	JW	Receive and review filed fourth amended complaint.	0.10 \$375.00	\$37.50 ✓
4/23/2019	JW	Initial review of drafts of discovery requests to Defendants.	0.20 \$375.00	\$75.00 ✓
4/25/2019	JW	Review Defendants' answers to fourth amended complaint.	0.30 \$375.00	\$112.50 ✓
4/25/2019	JW	Detailed review of drafts of interrogatories and document requests to Defendants, and provide revisions and comments regarding same to Matt Gilliam; review draft of amended initial disclosures.	0.70 \$375.00	\$262.50 ✓
For professional services rendered				<u>\$1,387.50</u> ✓
Total New Charges				<u>\$1,387.50</u> ✓
Previous Balance				\$1,912.50
Balance Due				<u><u>\$3,300.00</u></u>

Payment is due upon receipt

JENKINS & WATKINS, P.C.

Highland Park West
4300 MacArthur Avenue, Suite 165
Dallas, TX 75209-6524

TAX I.D. #75-1321489

(214) 378-6675

May 25, 2019

Maureen Waller
National Right to Work Legal Defense Foundation
8001 Braddock Rd., Ste. 600
Springfield, VA 22160

Invoice # 27159

RE: Carter, Charlene/Transport Workers Union, Local 556

Current Fees for this Invoice	\$787.50 ✓
Current Expenses for this Invoice	\$0.00
Total Charges for this Invoice	<u>\$787.50</u> ✓ MBW App'd 7/16/19
Previous Balance	\$3,300.00
Payments/Credits	<u>\$-1,912.50</u>
Total Now Due	<u><u>\$2,175.00</u></u>

*Payment is due upon receipt.
Please reference the Invoice Number on your payment.*

JENKINS & WATKINS, P.C.

Highland Park West
 4300 MacArthur Avenue, Suite 165
 Dallas, TX 75209-6524

TAX I.D. #75-1321489

(214) 378-6675

May 25, 2019

Maureen Waller
 National Right to Work Legal Defense Foundation
 8001 Braddock Rd., Ste. 600
 Springfield, VA 22160

Invoice #27159

RE: Carter, Charlene/Transport Workers Union, Local 556

Professional Services:

				<u>Amount</u>	
4/26/2019	JW	Review final drafts and final served copies of discovery requests to Defendants.	0.20 \$375.00	\$75.00	✓
4/30/2019	JW	Receive and review Plaintiff's served supplemental disclosures.	0.10 \$375.00	\$37.50	✓
5/14/2019	JW	Receive and review email correspondence from opposing counsel regarding discovery requests.	0.10 \$375.00	\$37.50	✓
5/15/2019	JW	Telephone conference with Matt Gilliam and multiple correspondence with counsel regarding discovery issues with Southwest.	0.60 \$375.00	\$225.00	✓
5/17/2019	JW	Multiple correspondence and telephone call with counsel regarding ongoing discovery issues with Southwest.	0.80 \$375.00	\$300.00	✓

5/21/2019	JW	Review multiple email correspondence between counsel regarding Southwest discovery responses.	0.20 \$375.00	\$75.00 ✓
5/22/2019	JW	Correspondence with counsel regarding Southwest discovery.	0.10 \$375.00	\$37.50 ✓
For professional services rendered				<u>\$787.50</u> ✓
Total New Charges				<u>\$787.50</u> ✓
Previous Balance				\$3,300.00
5/14/2019	Payment			\$-1,912.50
Total Payments and Credits				<u>\$-1,912.50</u>
Balance Due				<u><u>\$2,175.00</u></u>

Payment is due upon receipt

JENKINS & WATKINS, P.C.

Highland Park West
4300 MacArthur Avenue, Suite 165
Dallas, TX 75209-6524

TAX I.D. #75-1321489

(214) 378-6675

June 25, 2019

Maureen Waller
National Right to Work Legal Defense Foundation
8001 Braddock Rd., Ste. 600
Springfield, VA 22160

Invoice # 27183

RE: Carter, Charlene/Transport Workers Union, Local 556

Current Fees for this Invoice	\$112.50 ✓
Current Expenses for this Invoice	\$0.00
Total Charges for this Invoice	<u>\$112.50</u> ✓ MBH APR 2 7/16/19
Previous Balance	\$2,175.00
Payments/Credits	<u>\$-1,387.50</u>
Total Now Due	<u><u>\$900.00</u></u>

*Payment is due upon receipt.
Please reference the Invoice Number on your payment.*

JENKINS & WATKINS, P.C.

Highland Park West
4300 MacArthur Avenue, Suite 165
Dallas, TX 75209-6524

TAX I.D. #75-1321489

(214) 378-6675

June 25, 2019

Maureen Waller
National Right to Work Legal Defense Foundation
8001 Braddock Rd., Ste. 600
Springfield, VA 22160

Invoice #27183

RE: Carter, Charlene/Transport Workers Union, Local 556

Professional Services:

				<u>Amount</u>	
6/11/2019	JW	Telephone call with Matt Gilliam regarding Defendants' written discovery responses.	0.20	\$75.00	✓
			\$375.00		
6/14/2019	JW	Receive and review correspondence and draft of protective order from counsel for Southwest.	0.10	\$37.50	✓
			\$375.00		
6/24/2019	JW	Email correspondence from Matt Gilliam regarding proposed protective order. (No Charge)	0.25	No Charge	
			\$375.00		

For professional services rendered

\$112.50 ✓

Total New Charges

\$112.50

Previous Balance

\$2,175.00

6/18/2019 Payment	\$-1,387.50
Total Payments and Credits	<u>\$-1,387.50</u>
Balance Due	<u><u>\$900.00</u></u>

Payment is due upon receipt

JENKINS & WATKINS, P.C.

Highland Park West
4300 MacArthur Avenue, Suite 165
Dallas, TX 75209-6524

TAX I.D. #75-1321489

(214) 378-6675

August 25, 2019

Maureen Waller
National Right to Work Legal Defense Foundation
8001 Braddock Rd., Ste. 600
Springfield, VA 22160

Invoice # 27243

RE: Carter, Charlene/Transport Workers Union, Local 556

Current Fees for this Invoice	\$750.00
Current Expenses for this Invoice	\$0.00
Total Charges for this Invoice	<u>\$750.00</u>
Previous Balance	\$525.00
Payments/Credits	<u>\$0.00</u>
Total Now Due	<u><u>\$1,275.00</u></u>

Payment is due upon receipt.
Please reference the Invoice Number on your payment.

App.160

JENKINS & WATKINS, P.C.

Highland Park West
 4300 MacArthur Avenue, Suite 165
 Dallas, TX 75209-6524

TAX I.D. #75-1321489

(214) 378-6675

August 25, 2019

Maureen Waller
 National Right to Work Legal Defense Foundation
 8001 Braddock Rd., Ste. 600
 Springfield, VA 22160

Invoice #27243

RE: Carter, Charlene/Transport Workers Union, Local 556

Professional Services:

				<u>Amount</u>	
7/26/2019	JW	Telephone conference with Matt Gilliam regarding discovery issues; review multiple email correspondence regarding TWU discovery and document production, and draft of protective order.	0.50 \$375.00	\$187.50	✓
7/29/2019	JW	Correspondence with Matt Gilliam regarding drafting of potential motion to compel and provide forms of motions for reference; review correspondence to TWU counsel regarding outstanding discovery issues.	0.40 \$375.00	\$150.00	✓
7/31/2019	JW	Review TWU's first amended interrogatory and document request responses and objections, and evaluate TWU's objections and assertions of privilege under the rules; correspondence with Matthew Gilliam regarding TWU's discovery responses and potential motion to compel.	0.80 \$375.00	\$300.00	✓
8/09/2019	JW	Telephone call from mediator, and correspondence to Matt Gilliam regarding same.	0.20 \$375.00	\$75.00	✓

8/13/2019 JW Correspondence with Matt Gilliam regarding mediation status and scheduling.

0.10
\$375.00

\$37.50 ✓

For professional services rendered

\$750.00 ✓

Total New Charges

\$750.00 ✓

Previous Balance

\$525.00

*Paid
8/29*

Balance Due

\$1,275.00

Payment is due upon receipt

JENKINS & WATKINS, P.C.

Highland Park West
 4300 MacArthur Avenue, Suite 165
 Dallas, TX 75209-6524

TAX I.D. #75-1321489

(214) 378-6675

September 25, 2019

Laverne Stanley
 National Right to Work Legal Defense Foundation
 8001 Braddock
 Suite 600
 Springfield, VA 22160

Invoice #27274

 RE: Carter, Charlene/Transport Workers Union, Local 556
Professional Services:

				<u>Amount</u>	
9/03/2019	JW	Receive and review court order transferring case to newly appointed judge.	0.10 \$375.00	\$37.50	✓
9/04/2019	JW	Review and analyze Southwest's revisions to proposed protective order, and review Matt Gilliam's correspondence and comments regarding same.	0.80 \$375.00	\$300.00	✓
9/05/2019	JW	Correspondence with Matt Gilliam with revisions and comments on current draft of proposed protective order (.5); telephone conference with Matt Gilliam regarding protective order and related case issues (.9).	1.40 \$375.00	\$525.00	✓
9/06/2019	JW	Review TWU Local 556's revisions to proposed protective order and related correspondence; review Matt Gilliam's most recent revision to proposed protective order forwarded to opposing counsel.	0.20 \$375.00	\$75.00	✓

9/17/2019	JW	Review draft correspondence to Local 556 regarding discovery issues, and correspondence with Matt Gilliam regarding same.	0.10 \$375.00	\$37.50	✓
9/19/2019	JW	Review multiple correspondence with opposing counsel regarding outstanding discovery issues and protective order; review Southwest revisions to draft protective order.	0.40 \$375.00	\$150.00	✓
9/23/2019	JW	Review correspondence with opposing counsel regarding protective order and discovery disputes.	0.10 \$375.00	\$0.00	✓
9/24/2019	JW	Receive and review Southwest's interrogatories and request for production of documents to Carter, and determine and docket due date.	0.30 \$375.00	\$112.50	✓
9/25/2019	JW	Review correspondence with TWU counsel regarding discovery conference. (No charge.)	0.25 \$375.00	No Charge	✓
For professional services rendered				<u>\$1,237.50</u>	✓
Total New Charges				<u>\$1,237.50</u>	✓
Previous Balance				\$1,275.00	✓
9/10/2019 Payment				\$-525.00	
9/25/2019 Payment				\$-750.00	
Total Payments and Credits				<u>\$-1,275.00</u>	
Balance Due				<u><u>\$1,237.50</u></u>	✓

Payment is due upon receipt

JENKINS & WATKINS, P.C.

Highland Park West
 4300 MacArthur Avenue, Suite 165
 Dallas, TX 75209-6524

TAX I.D. #75-1321489

(214) 378-6675

October 25, 2019

Laverne Stanley
 National Right to Work Legal Defense Foundation
 8001 Braddock, Ste. 600
 Springfield, VA 22160

Invoice # 27271

RE: Carter, Charlene/Transport Workers Union, Local 556

Professional Services:

				<u>Amount</u>
9/26/2019	JW	Review correspondence with TWU counsel regarding conference call to discuss discovery issues. (No Charge)	0.25 \$375.00	No Charge ✓
9/30/2019	JW	Review correspondence with SWA counsel regarding discovery regarding discovery requests.	0.10 \$375.00	\$37.50 ✓
10/01/2019	JW	Review correspondence with counsel regarding protective order. (No Charge)	0.20 \$375.00	No Charge ✓
10/02/2019	JW	Review final draft of protective order, and telephone conference with Matt Gilliam to discuss protective order and related discovery issues.	0.60 \$375.00	\$225.00 ✓
10/03/2019	JW	Review and revise joint motion for entry of a stipulated protective order, and correspondence with Matt Gilliam regarding same; review correspondence with opposing counsel.	0.50 \$375.00	\$187.50 ✓

10/21/2019	JW	Review correspondence with counsel discovery scheduling. (No Charge)	0.10 \$375.00	No Charge ✓
10/22/2019	JW	Review further correspondence with counsel regarding discovery scheduling issues. (No charge.)	0.10 \$375.00	\$37.50 ✓
10/23/2019	JW	Review multiple correspondence among counsel regarding meeting to discuss discovery issues.	0.10 \$375.00	\$37.50 ✓
10/24/2019	JW	Check status of discovery response deadline and extension of same, and correspondence with Matt Gilliam regarding same.	0.10 \$375.00	\$37.50 ✓
For professional services rendered				<u>\$562.50</u> ✓
Total New Charges				<u>\$562.50</u> ✓
Previous Balance				\$1,237.50
Balance Due				<u><u>\$1,800.00</u></u>

Payment is due upon receipt

JENKINS & WATKINS, P.C.

Highland Park West
4300 MacArthur Avenue, Suite 165
Dallas, TX 75209-6524

TAX I.D. #75-1321489

(214) 378-6675

December 25, 2019

Laverne Stanley
National Right to Work Legal Defense Foundation
8001 Braddock, Ste. 600
Springfield, VA 22160

Invoice # 27331

RE: Carter, Charlene/Transport Workers Union, Local 556

Current Fees for this Invoice	\$1,350.00
Current Expenses for this Invoice	<u>\$0.00</u>
Total Charges for this Invoice	\$1,350.00
Previous Balance	\$450.00
Payments/Credits	<u>\$0.00</u>
Total Now Due	<u><u>\$1,800.00</u></u>

App'd by
WJH
1/13/20
Already
paid

*Payment is due upon receipt.
Please reference the Invoice Number on your payment.*

JENKINS & WATKINS, P.C.

Highland Park West
 4300 MacArthur Avenue, Suite 165
 Dallas, TX 75209-6524

TAX I.D. #75-1321489

(214) 378-6675

December 25, 2019

Laverne Stanley
 National Right to Work Legal Defense Foundation
 8001 Braddock, Ste. 600
 Springfield, VA 22160

Invoice # 27331

RE: Carter, Charlene/Transport Workers Union, Local 556

Professional Services:

				<u>Amount</u>	
11/27/2019	JW	Review drafts of Carter interrogatory responses and RFP responses; correspondence with Matt Gilliam regarding same.	0.80 \$375.00	\$300.00	✓
12/02/2019	JW	Review Carter's final responses to SWA's interrogatories and responses to SWA's request for production of documents.	0.40 \$375.00	\$150.00	✓
12/03/2019	JW	Receive and review Carter privilege log and related correspondence.	0.20 \$375.00	\$75.00	✓
12/03/2019	JW	Receive and review SWA's redlined proposal for joint motion to extend deadlines.	0.40 \$375.00	\$150.00	✓
12/04/2019	JW	Review and revise latest draft of joint motion to modify scheduling order; correspondence with Matt Gilliam regarding joint motion and proposed order.	1.20 \$375.00	\$450.00	✓

12/09/2019	JW	Review correspondence with SWA counsel and revisions to draft of joint motion for extension.	0.20 \$375.00	\$75.00 ✓
12/11/2019	JW	Review final drafts of joint motion to modify scheduling order and proposed order.	0.20 \$375.00	\$75.00 ✓
12/13/2019	JW	Email correspondence and telephone call regarding filing of joint motion to extended scheduling order deadlines; receive and review filed motion and proposed order.	0.20 \$375.00	\$75.00 ✓

For professional services rendered

Total New Charges

Previous Balance

Balance Due

\$1,350.00 ✓
\$1,350.00
\$450.00
<u>\$1,800.00</u>

App. 169
MBH
1/13/20

Payment is due upon receipt

JENKINS & WATKINS, P.C.

Highland Park West
4300 MacArthur Avenue, Suite 165
Dallas, TX 75209-6524

TAX I.D. #75-1321489

(214) 378-6675

February 25, 2020

Laverne Stanley
National Right to Work Legal Defense Foundation
8001 Braddock, Ste. 600
Springfield, VA 22160

Invoice # 27391

RE: Carter, Charlene/Transport Workers Union, Local 556

Current Fees for this Invoice	\$600.00
Current Expenses for this Invoice	<u>\$0.00</u>
Total Charges for this Invoice	\$600.00
 Previous Balance	 \$0.00
Payments/Credits	<u>\$0.00</u>
 Total Now Due	 <u><u>\$600.00</u></u> ✓

*Payment is due upon receipt.
Please reference the Invoice Number on your payment.*

App'd
MBH
3/6/20

JENKINS & WATKINS, P.C.

Highland Park West
 4300 MacArthur Avenue, Suite 165
 Dallas, TX 75209-6524

TAX I.D. #75-1321489

(214) 378-6675

February 25, 2020

Laverne Stanley
 National Right to Work Legal Defense Foundation
 8001 Braddock, Ste. 600
 Springfield, VA 22160

Invoice # 27391

RE: Carter, Charlene/Transport Workers Union, Local 556

Professional Services:

				<u>Amount</u>	
2/10/2020	JW	Telephone conferences with Matt Gilliam regarding case status.	0.40 \$375.00	\$150.00	✓
2/12/2020	JW	Receive and review court order to file joint status report with agreed-upon scheduling deadlines.	0.10 \$375.00	\$37.50	✓
2/13/2020	JW	Receive and review court order terminating case pending joint scheduling order; telephone conference with Matt Gilliam regarding same.	0.20 \$375.00	\$75.00	✓
2/18/2020	JW	Review correspondence with counsel regarding scheduling of telephone conference to discuss schedule. (No Charge)	0.30 \$375.00	No Charge	✓
2/19/2020	JW	Review agreed draft of joint status report on proposed scheduling deadlines; review email correspondence with counsel regarding same.	0.30 \$375.00	\$112.50	✓

2/20/2020	JW	Review multiple email correspondence among counsel regarding changes to proposed scheduling order; review revised proposed scheduling order.	0.50 \$375.00	\$187.50 ✓
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2/21/2020	JW	Receive and review filed joint status report with proposed scheduling order.	0.10 \$375.00	\$37.50 ✓
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For professional services rendered

\$600.00 ✓

Total New Charges

\$600.00 ✓

Previous Balance

\$0.00

Balance Due

\$600.00 ✓

Payment is due upon receipt

JENKINS & WATKINS, P.C.

Highland Park West
4300 MacArthur Avenue, Suite 165
Dallas, TX 75209-6524

TAX I.D. #75-1321489

(214) 378-6675

March 25, 2020

Laverne Stanley
National Right to Work Legal Defense Foundation
8001 Braddock, Ste. 600
Springfield, VA 22160

Invoice # 27429

RE: Carter, Charlene/Transport Workers Union, Local 556

Current Fees for this Invoice	\$75.00 ✓
Current Expenses for this Invoice	<u>\$0.00</u> ✓
Total Charges for this Invoice	\$75.00
Previous Balance	\$600.00
Payments/Credits	<u>\$-600.00</u>
Total Now Due	<u><u>\$75.00</u></u> ✓

Payment is due upon receipt.
Please reference the Invoice Number on your payment.

Approved by
WBJ
4/27/20

JENKINS & WATKINS, P.C.

Highland Park West
 4300 MacArthur Avenue, Suite 165
 Dallas, TX 75209-6524

TAX I.D. #75-1321489

(214) 378-6675

March 25, 2020

Laverne Stanley
 National Right to Work Legal Defense Foundation
 8001 Braddock, Ste. 600
 Springfield, VA 22160

Invoice # 27429

RE: Carter, Charlene/Transport Workers Union, Local 556

Professional Services:

				<u>Amount</u>
3/04/2020	JW	Receive and review court order reopening case and setting scheduling order and trial setting, and docket new deadlines and dates.	0.20	\$75.00 ✓
			\$375.00	
3/04/2020	JW	Receive and review Southwest's motion to substitute attorney. (No Charge)	0.10	No Charge
			\$375.00	

For professional services rendered\$75.00

Total New Charges

\$75.00

Previous Balance

\$600.00

3/17/2020 Payment

\$-600.00

Total Payments and Credits

\$-600.00

Balance Due

\$75.00

Payment is due upon receipt

JENKINS & WATKINS, P.C.

Highland Park West
4300 MacArthur Avenue, Suite 165
Dallas, TX 75209-6524

TAX I.D. #75-1321489

(214) 378-6675

May 25, 2020

Laverne Stanley
National Right to Work Legal Defense Foundation
8001 Braddock, Ste. 600
Springfield, VA 22160

Invoice # 27511

RE: Carter, Charlene/Transport Workers Union, Local 556

Current Fees for this Invoice	\$712.50 ✓
Current Expenses for this Invoice	<u>\$0.00</u> ✓
Total Charges for this Invoice	\$712.50
Previous Balance	\$75.00
Payments/Credits	<u>\$-75.00</u>
Total Now Due	<u>\$712.50</u> ✓

*Payment is due upon receipt.
Please reference the Invoice Number on your payment.*

Am's MBH
6/19/20

JENKINS & WATKINS, P.C.

Highland Park West
 4300 MacArthur Avenue, Suite 165
 Dallas, TX 75209-6524

TAX I.D. #75-1321489

(214) 378-6675

May 25, 2020

Laverne Stanley
 National Right to Work Legal Defense Foundation
 8001 Braddock, Ste. 600
 Springfield, VA 22160

Invoice # 27511

RE: Carter, Charlene/Transport Workers Union, Local 556

Professional Services:

				<u>Amount</u>	
5/12/2020	JW	Review and revise motion to compel union to respond to discovery, brief in support, and proposed order.	1.20 \$375.00	<u>\$450.00</u>	✓
5/13/2020	JW	Telephone call with Matt Gilliam regarding legal arguments and strategy on motion to compel discovery from union; review additional legal authorities regarding discovery of comparator employees and forward to Matt Gilliam for review.	0.40 \$375.00	<u>\$150.00</u>	✓
5/14/2020	JW	Telephone call from Matt Gilliam regarding update on motion to compel and discovery issues with union; receive and review filed copies of motion to compel, brief in support, appendix in support, and proposed order.	0.30 \$375.00	<u>\$112.50</u>	✓
For professional services rendered				<u>\$712.50</u>	✓
Total New Charges				<u>\$712.50</u>	

Previous Balance	\$75.00
5/11/2020 Payment	\$-75.00
Total Payments and Credits	<u>\$-75.00</u>
Balance Due	<u><u>\$712.50</u></u>

Payment is due upon receipt

JENKINS & WATKINS, P.C.

Highland Park West
4300 MacArthur Avenue, Suite 165
Dallas, TX 75209-6524

TAX I.D. #75-1321489

(214) 378-6675

June 25, 2020

Laverne Stanley
National Right to Work Legal Defense Foundation
8001 Braddock, Ste. 600
Springfield, VA 22160

Invoice # 27539

RE: Carter, Charlene/Transport Workers Union, Local 556

Current Fees for this Invoice	\$1,987.50
Current Expenses for this Invoice	<u>\$0.00</u>
Total Charges for this Invoice	\$1,987.50
Previous Balance	\$712.50
Payments/Credits	<u>\$0.00</u>
Total Now Due	<u><u>\$2,700.00</u></u>

Payment is due upon receipt.
Please reference the Invoice Number on your payment.

JENKINS & WATKINS, P.C.

Highland Park West
 4300 MacArthur Avenue, Suite 165
 Dallas, TX 75209-6524

TAX I.D. #75-1321489

(214) 378-6675

June 25, 2020

Laverne Stanley
 National Right to Work Legal Defense Foundation
 8001 Braddock, Ste. 600
 Springfield, VA 22160

Invoice # 27539

RE: Carter, Charlene/Transport Workers Union, Local 556

Professional Services:

				<u>Amount</u>	
6/03/2020	JW	Review initial draft of Audrey Stone subpoena; review Milton Chappell's comments and revisions to subpoena.	0.60 \$375.00	\$225.00	✓
6/04/2020	JW	Revise draft of subpoena duces tecum to Audrey Stone, and correspondence regarding same.	0.60 \$375.00	\$225.00	✓
6/05/2020	JW	Receive and review correspondence from mediator regarding status of scheduling mediation. (No Charge)	0.10 \$375.00	No Charge	✓
6/05/2020	JW	Review TWU's Response to Motion to Compel and supporting documents; receive and review court order of reference to magistrate judge.	0.80 \$375.00	\$300.00	✓
6/09/2020	JW	Receive and review court order setting hearing on motion to compel, and docket hearing date; review correspondence to mediator.	0.20 \$375.00	\$75.00	✓

6/11/2020	JW	Review revised draft of subpoena and related correspondence regarding protective order.	0.20 \$375.00	\$75.00 ✓
6/12/2020	JW	Review final notice of subpoena and attachment, and related correspondence to opposing counsel.	0.10 \$375.00	\$37.50 ✓
6/18/2020	JW	Review draft of reply in support of motion to compel discovery from Local 556 and comments and revisions by co-counsel; revise and comment on draft and correspondence with Matt Gilliam regarding same.	0.80 \$375.00	\$300.00 ✓
6/19/2020	JW	Review filed reply in support of motion to compel; telephone conference with Matt Gilliam regarding motion to compel and upcoming hearing; research recent case law regarding motion to compel documents and forward to Matt Gilliam for review.	0.70 \$375.00	\$262.50 ✓
6/22/2020	JW	Telephone call with Matt Gilliam regarding court teleconference logistics; attention to and review conference call logistics and follow up correspondence with Matt Gilliam regarding same.	0.60 \$375.00	\$225.00 ✓
6/23/2020	JW	Review correspondence with counsel regarding court hearing; review and analyze court order on motion to compel; review correspondence with counsel regarding court's order on motion.	0.60 \$375.00	\$225.00 ✓
6/24/2020	JW	Review correspondence among counsel regarding follow up to court order on motion to compel.	0.10 \$375.00	\$37.50 ✓
For professional services rendered				<u>\$1,987.50</u> ✓
Total New Charges				<u>\$1,987.50</u>
Previous Balance				\$712.50
Balance Due				<u><u>\$2,700.00</u></u>

JENKINS & WATKINS, P.C.

Highland Park West
4300 MacArthur Avenue, Suite 165
Dallas, TX 75209-6524

TAX I.D. #75-1321489

(214) 378-6675

August 25, 2020

Laverne Stanley
National Right to Work Legal Defense Foundation
8001 Braddock, Ste. 600
Springfield, VA 22160

Invoice # 27594

RE: Carter, Charlene/Transport Workers Union, Local 556

Current Fees for this Invoice	\$1,968.75
Current Expenses for this Invoice	<u>\$22.28</u>
Total Charges for this Invoice	\$1,991.03
Previous Balance	\$2,737.50
Payments/Credits	<u>\$-2,737.50</u>
Total Now Due	<u>\$1,991.03</u>

- \$93.75

*Payment is due upon receipt.
Please reference the Invoice Number on your payment.*

pay
\$1,897.28
MBH
10/5/20

JENKINS & WATKINS, P.C.

Highland Park West
4300 MacArthur Avenue, Suite 165
Dallas, TX 75209-6524

TAX I.D. #75-1321489

(214) 378-6675

August 25, 2020

Laverne Stanley
National Right to Work Legal Defense Foundation
8001 Braddock, Ste. 600
Springfield, VA 22160

Invoice # 27594

RE: Carter, Charlene/Transport Workers Union, Local 556

Professional Services:

				<u>Amount</u>	
7/27/2020	JW	Review court order regarding briefing schedule for motion for leave to file sur-reply; review SWA's response and objection to motion to file sur-reply.	0.40 \$375.00	\$150.00	✓
7/28/2020	JW	Review and revise draft of reply in support of motion for leave to file sur-reply.	0.40 \$375.00	\$150.00	✓
7/29/2020	JW	Review additional revisions and comments on Reply in support of Motion for Leave to File Sur-Reply; review final draft after revisions.	0.20 \$375.00	\$75.00	✓
7/29/2020	JW	Finalize and mail out cease and desist letter to John Martin.	0.25 \$375.00	\$93.75	Do not pay X
7/30/2020	JW	Review court order regarding in camera filing of affidavits and brief on privilege regarding motion for sanctions.	0.10 \$375.00	\$37.50	✓

7/31/2020	JW	Review correspondence from TWA counsel regarding motion for extension; review filed motion for extension by TWA.	0.10 \$375.00	\$37.50 ✓
8/03/2020	JW	Review court order on TWU's motion for time extension.	0.10 \$375.00	\$37.50 ✓
8/03/2020	JW	Telephone call with Jeff Jennings regarding in camera filing procedures. (No Charge)	0.10 \$375.00	No Charge ✓
8/05/2020	JW	Attention to planning for courier delivery of in camera documents and correspondence with Jeff Jennings regarding same (.1); review and comment on in camera brief (.9); review draft affidavits and appendix (.3)	1.30 \$375.00	\$487.50 ✓
8/06/2020	JW	Review final drafts of in camera brief and declarations; telephone call with Matt Gilliam regarding in camera submission; prepare transmittal letter and prepare final documents for submission; confirm delivery of brief and appendix to clerk's office; correspondence with Matt Gilliam confirming delivery of submission.	1.20 \$375.00	\$450.00 ✓
8/11/2020	JW	Review draft of motion for extension of time to file renewed motion to compel and correspondence with Matt Gilliam an Jeff Jennings regarding same; review Jeff Jennings' proposed revision to draft motion.	0.20 \$375.00	\$75.00 ✓
8/12/2020	JW	Receive and review filed motion for extension to file renewed motion to compel.	0.10 \$375.00	\$37.50 ✓
8/20/2020	JW	Receive and review court order of referral and court order granting motion for extension to file motion to compel.	0.10 \$375.00	\$37.50 ✓
8/20/2020	JW	Review draft renewed motion to compel and provide comments to Matt Gilliam.	0.40 \$375.00	\$150.00 ✓
8/22/2020	JW	Receive and review filed renewed motion to compel, supporting brief and appendix.	0.30 \$375.00	\$112.50 ✓

8/24/2020 JW Review two court orders regarding referral of motion to
compel and briefing schedule for motion to compel.

0.10
\$375.00

\$37.50 ✓

For professional services rendered

\$1,968.75

Expenses

Courier

Amount

\$22.28 ✓

Total costs

\$22.28 ✓

Total New Charges

\$1,991.03

Previous Balance

\$2,737.50

8/25/2020 Payment

\$-2,737.50

Total Payments and Credits

\$-2,737.50

Balance Due

\$1,991.03 X

Payment is due upon receipt

*Pay
only
\$1,897.28
MHT*

JENKINS & WATKINS, P.C.

Highland Park West
4300 MacArthur Avenue, Suite 165
Dallas, TX 75209-6524

TAX I.D. #75-1321489

(214) 378-6675

October 25, 2020

Laverne Stanley
National Right to Work Legal Defense Foundation
8001 Braddock, Ste. 600
Springfield, VA 22160

Invoice # 27648

RE: Carter, Charlene/Transport Workers Union, Local 556

Current Fees for this Invoice	\$2,437.50 ✓
Current Expenses for this Invoice	<u>\$80.00</u> ✓
Total Charges for this Invoice	\$2,517.50 ✓
Previous Balance	\$2,741.03 ✓
Payments/Credits	<u>\$-1,991.03</u> ✓
Total Now Due	<u><u>\$3,267.50</u></u> ✓

*Payment is due upon receipt.
Please reference the Invoice Number on your payment.*

App'd
MBS
12/1/20

JENKINS & WATKINS, P.C.

Highland Park West
 4300 MacArthur Avenue, Suite 165
 Dallas, TX 75209-6524

TAX I.D. #75-1321489

(214) 378-6675

September 25, 2020

Laverne Stanley
 National Right to Work Legal Defense Foundation
 8001 Braddock, Ste. 600
 Springfield, VA 22160

Invoice # 27623

RE: Carter, Charlene/Transport Workers Union, Local 556

Professional Services:

				<u>Amount</u>	
9/01/2020	JW	Review Southwest's supplemental filing in support of motion for sanctions.	0.20 \$375.00	\$75.00	✓
9/09/2020	JW	Review email to Southwest counsel regarding outstanding discovery issues.	0.10 \$375.00	\$37.50	✓
9/11/2020	JW	Receive and review TWU's response to renewed motion to compel.	0.50 \$375.00	\$187.50	✓
9/14/2020	JW	Review correspondence from Southwest counsel regarding discovery dispute relating to Southwest's discovery objections and responses.	0.10 \$375.00	\$37.50	✓
9/15/2020	JW	Receive and review order setting hearing on renewed motion to compel.	0.10 \$375.00	\$37.50	✓

9/16/2020	JW	Review email correspondence to Southwest regarding discovery.	0.10 \$375.00	\$37.50 ✓
9/18/2020	JW	Email correspondence with Matt Gilliam regarding form of designation of lead counsel (.2); telephone conference with Matt Gilliam regarding hearing on motion to compel and outstanding discovery issues (.4); review draft and filed notice of designation of lead counsel (.1).	0.70 \$375.00	\$262.50 ✓
9/21/2020	JW	Review court minute entry regarding hearing on motion to compel; email correspondence with Matt Gilliam regarding court ruling on motion to compel.	0.10 \$375.00	\$37.50 ✓
9/23/2020	JW	Receive and review court discovery order on second motion to compel TWA to produce discovery.	0.10 \$375.00	\$37.50 ✓
For professional services rendered				<u>\$750.00</u> ✓
Total New Charges				<u>\$750.00</u>
Previous Balance				\$1,991.03
Balance Due				<u><u>\$2,741.03</u></u>

Payment is due upon receipt

JENKINS & WATKINS, P.C.

Highland Park West
 4300 MacArthur Avenue, Suite 165
 Dallas, TX 75209-6524

TAX I.D. #75-1321489

(214) 378-6675

October 25, 2020

Laverne Stanley
 National Right to Work Legal Defense Foundation
 8001 Braddock, Ste. 600
 Springfield, VA 22160

Invoice # 27648

RE: Carter, Charlene/Transport Workers Union, Local 556

Professional Services:

				<u>Amount</u>	
9/28/2020	JW	Review potential expert witnesses and emails with Jeff Jennings regarding same.	0.20 \$375.00	\$75.00	✓
10/01/2020	JW	Call with Matthew Gilliam regarding discovery status and pending discovery disputes, and status of current scheduling order and strategy regarding same.	0.90 \$375.00	\$337.50	✓
10/07/2020	JW	Call with Matt Gilliam regarding discovery and case scheduling order.	0.20 \$375.00	\$75.00	✓
10/13/2020	JW	Multiple calls with Matt Gilliam and Jeff Jennings regarding pending discovery issues and disputes, and upcoming discovery scheduling (1.1); review prior email correspondence with Southwest counsel regarding document searches (.3).	1.40 \$375.00	\$525.00	✓

10/14/2020	JW	Review email correspondence with Southwest counsel regarding document production status and issues.	0.20 \$375.00	\$75.00 ✓
10/15/2020	JW	Emails with Matt Gilliam regarding potential deposition dates and subpoenas, and review draft deposition notice; attention to potential court reporters and email Matt Gilliam with court reporter contacts for upcoming depositions.	0.60 \$375.00	\$225.00 ✓
10/16/2020	JW	Review and provide comments and revisions to proposed rule 30(b)(6) deposition notice to Southwest, and email with Matt Gilliam regarding same; review legal authorities on application of work product doctrine to nonparty witness statements in follow up to earlier discussion and forward to Matt Gilliam for review.	0.80 \$375.00	\$300.00 ✓
10/19/2020	JW	Review Rule 45 deposition subpoenas and emails within Matt Gilliam regarding subpoenas.	0.20 \$375.00	\$75.00 ✓
10/20/2020	JW	Emails with Matt Gilliam regarding deposition subpoenas and fixing location for attendance (2); review final deposition notices and subpoenas and calendar same.	0.20 \$375.00	\$75.00 ✓
10/21/2020	JW	Review multiple deposition notices for Southwest and TWA depositions.	0.20 \$375.00	\$75.00 ✓
10/21/2020	JW	Review correspondence with Matt Gilliam regarding motion to compel.	0.10 \$375.00	\$37.50 ✓
10/23/2020	JW	Review draft of motion to compel and suggested revisions from Milton Chappell and Jeff Jennings (.8); call with Matt Gilliam regarding deposition subpoenas, motion to compel and procedures for upcoming depositions (.5); attention to witness fees for deposition subpoenas (.2).	1.50 \$375.00	\$562.50 ✓

For professional services rendered

\$2,437.50 ✓

Expenses

Amount

Witness fee	\$80.00
Total costs	<u>\$80.00</u>
Total New Charges	<u>\$2,517.50</u>
Previous Balance	\$2,741.03
10/01/2020 Credit	\$-93.75
<i>Removed inaccurate 7/29/2020 billing entry of \$93.75.</i>	
10/14/2020 Payment	\$-1,897.28
Total Payments and Credits	<u>\$-1,991.03</u>
Balance Due	<u><u>\$3,267.50</u></u>

Payment is due upon receipt

JENKINS & WATKINS, P.C.

Highland Park West
4300 MacArthur Avenue, Suite 165
Dallas, TX 75209-6524

TAX I.D. #75-1321489

(214) 378-6675

September 25, 2020

Laverne Stanley
National Right to Work Legal Defense Foundation
8001 Braddock, Ste. 600
Springfield, VA 22160

Invoice # 27623

RE: Carter, Charlene/Transport Workers Union, Local 556

Current Fees for this Invoice	\$750.00
Current Expenses for this Invoice	<u>\$0.00</u>
Total Charges for this Invoice	\$750.00
 Previous Balance	 \$1,991.03
Payments/Credits	<u>\$0.00</u>
 Total Now Due	 <u><u>\$2,741.03</u></u>

Payment is due upon receipt.
Please reference the Invoice Number on your payment.

JENKINS & WATKINS, P.C.

Highland Park West
4300 MacArthur Avenue, Suite 165
Dallas, TX 75209-6524

TAX I.D. #75-1321489

(214) 378-6675

November 25, 2020

Laverne Stanley
National Right to Work Legal Defense Foundation
8001 Braddock, Ste. 600
Springfield, VA 22160

Invoice # 27669

RE: Carter, Charlene/Transport Workers Union, Local 556

Current Fees for this Invoice	\$2,137.50	✓
Current Expenses for this Invoice	\$67.28	✓
Total Charges for this Invoice	\$2,204.78	✓
Previous Balance	\$3,267.50	
Payments/Credits	\$0.00	
Total Now Due	\$5,472.28	

✓ App'd
MB
12/14/20

*Payment is due upon receipt.
Please reference the Invoice Number on your payment.*

JENKINS & WATKINS, P.C.

Highland Park West
 4300 MacArthur Avenue, Suite 165
 Dallas, TX 75209-6524

TAX I.D. #75-1321489

(214) 378-6675

November 25, 2020

Laverne Stanley
 National Right to Work Legal Defense Foundation
 8001 Braddock, Ste. 600
 Springfield, VA 22160

Invoice # 27669

RE: Carter, Charlene/Transport Workers Union, Local 556

Professional Services:

				<u>Amount</u>	
10/26/2020	JW	Letter to Southwest attorney M. Correll for delivery of deposition subpoena witness fees and attention to same.	0.50 \$375.00	\$187.50	✓
10/27/2020	JW	Receive and review Southwest's notice of intent to issue document subpoenas	0.10 \$375.00	\$37.50	✓
11/09/2020	JW	Review draft Subpoena and Notice for Audrey Stone and emails with Matt Gilliam regarding drafting issues (.2); telephone call with Matt Gilliam regarding discovery, deposition subpoena fees, and anticipated discovery motions (.5); receive and review email from mediator Karen Wilcutts (.1); attention to Stone Subpoena witness fee and transmittal letter to attorney Joe Gillespie (.2).	1.00 \$375.00	\$375.00	✓
11/10/2020	JW	Review draft of Rule 30(b)(6) deposition topics for TWU corporate representative deposition, and email with Matt Gilliam regarding same.	0.30 \$375.00	\$112.50	✓

11/11/2020	JW	Review and revise drafts of motion to compel and brief in support, and emails with Matt Gilliam regarding same.	1.20 \$375.00	\$450.00	✓
11/12/2020	JW	Telephone call with Matt Gilliam regarding motion to compel and other discovery issues.	0.20 \$375.00	\$75.00	✓
11/13/2020	JW	Receive and review notice of deposition for Carter.	0.10 \$375.00	\$37.50	✓
11/16/2020	JW	Receive and review filed motion to compel, brief in support, and appendix in support, and calendar response deadline.	0.40 \$375.00	\$150.00	✓
11/17/2020	JW	Receive and review court order expediting briefing scheduling and setting hearing, and calendar applicable dates.	0.20 \$375.00	\$75.00	✓
11/19/2020	JW	Email correspondence with court reporter and Matt Gilliam regarding exhibits for Carter deposition; telephone call with Matt Gilliam regarding Carter deposition.	0.30 \$375.00	\$112.50	✓
11/20/2020	JW	Receive and review court minute entry regarding discovery hearing.	0.10 \$375.00	\$37.50	✓
11/25/2020	JW	Telephone call with Matt Gilliam regarding discovery and deposition update and motion to compel.	0.50 \$375.00	\$187.50	✓
11/25/2020	JW	Review draft of responses and objections to TWU's interrogatories.	0.80 \$375.00	\$300.00	✓

For professional services rendered

 \$2,137.50 ✓
Expenses
 Courier
 Witness fee

 Amount

\$27.28 ✓

\$40.00 ✓

Total costs	<u> </u> ✓ \$67.28
Total New Charges	<u> </u> ✓ \$2,204.78
Previous Balance	\$3,267.50 <i>Previously App'd</i>
Balance Due	<u> </u> <u> </u> \$5,472.28

Payment is due upon receipt

JENKINS & WATKINS, P.C.

Highland Park West
4300 MacArthur Avenue, Suite 165
Dallas, TX 75209-6524

TAX I.D. #75-1321489

(214) 378-6675

January 25, 2021

Laverne Stanley
National Right to Work Legal Defense Foundation
8001 Braddock, Ste. 600
Springfield, VA 22160

Invoice # 27724

RE: Carter, Charlene/Transport Workers Union, Local 556

Current Fees for this Invoice	\$937.50
Current Expenses for this Invoice	<u>\$0.00</u>
Total Charges for this Invoice	\$937.50
 Previous Balance	 \$1,912.50
Payments/Credits	<u>\$-1,912.50</u>
 Total Now Due	 <u><u>\$937.50</u></u> ✓

Payment is due upon receipt.
Please reference the Invoice Number on your payment.

APR 6
2021
2/19/21

JENKINS & WATKINS, P.C.

Highland Park West
4300 MacArthur Avenue, Suite 165
Dallas, TX 75209-6524

TAX I.D. #75-1321489

(214) 378-6675

January 25, 2021

Laverne Stanley
National Right to Work Legal Defense Foundation
8001 Braddock, Ste. 600
Springfield, VA 22160

Invoice # 27724

RE: Carter, Charlene/Transport Workers Union, Local 556

Professional Services:

				<u>Amount</u>	
1/04/2021	JW	Review and evaluate expert report from Dr. Christine Reed; review compliance with Rule 26(a)(2) expert disclosure requirements; review draft and final served version of attorney fee expert disclosures; emails with Jeff Jennings regarding expert report and Rule 26(a)(2) requirements, and regarding designation of attorney fee experts.	1.40 \$375.00	\$525.00	✓
1/04/2021	JW	Review drafts of two reply briefs in support of motion to extend fact discovery, and email with Matt Gilliam regarding same.	0.60 \$375.00	\$225.00	✓
1/05/2021	JW	Receive and review filed reply briefs in support of motion to extend fact discovery.	0.20 \$375.00	\$75.00	✓
1/06/2021	JW	Receive and review correspondence from Southwest counsel regarding confidentiality designations.	0.10 \$375.00	\$37.50	✓

1/07/2021	JW	Emails with Matt Gilliam regarding deposition errata sheet.	0.20	\$75.00	✓
			\$375.00		

For professional services rendered

\$937.50 ✓

Total New Charges

\$937.50

Previous Balance

\$1,912.50

1/22/2021 Payment

\$-1,912.50

Total Payments and Credits

\$-1,912.50

Balance Due

\$937.50 ✓

Payment is due upon receipt

JENKINS & WATKINS, P.C.

Highland Park West
 4300 MacArthur Avenue, Suite 165
 Dallas, TX 75209-6524

TAX I.D. #75-1321489

(214) 378-6675

February 25, 2021

Laverne Stanley
 National Right to Work Legal Defense Foundation
 8001 Braddock, Ste. 600
 Springfield, VA 22160

Invoice # 27751

RE: Carter, Charlene/Transport Workers Union, Local 556

Professional Services:

				<u>Amount</u>	
2/05/2021	JW	Review status of pending motions and check status of any expert designations from defendants.	0.10 \$375.00	\$37.50	✓
2/17/2021	JW	Emails with Jeff Jennings regarding motion to withdraw as counsel and provide sample form of motion and order.	0.20 \$375.00	\$75.00	✓
2/18/2021	JW	Receive and review emails with opposing counsel regarding conference on motion to withdraw.	0.10 \$375.00	\$37.50	✓
2/22/2021	JW	Review and revise Jeff Jennings' motion to withdraw.	0.30 \$375.00	\$112.50	✓
2/23/2021	JW	Receive and review filed motion to withdraw and proposed order.	0.10 \$375.00	\$37.50	✓
For professional services rendered				<u>\$300.00</u>	✓

JENKINS & WATKINS, P.C.

Highland Park West
4300 MacArthur Avenue, Suite 165
Dallas, TX 75209-6524

TAX I.D. #75-1321489

(214) 378-6675

March 25, 2021

Laverne Stanley
National Right to Work Legal Defense Foundation
8001 Braddock, Ste. 600
Springfield, VA 22160

Invoice # 27786

RE: Carter, Charlene/Transport Workers Union, Local 556

Current Fees for this Invoice	\$37.50 ✓
Current Expenses for this Invoice	<u>\$0.00</u>
Total Charges for this Invoice	\$37.50
Previous Balance	\$1,237.50
Payments/Credits	<u>\$-937.50</u>
Total Now Due	<u><u>\$337.50</u></u>

*Payment is due upon receipt.
Please reference the Invoice Number on your payment.*

OK'd for
\$37.50
MBT
4/6/21

JENKINS & WATKINS, P.C.

Highland Park West
4300 MacArthur Avenue, Suite 165
Dallas, TX 75209-6524

TAX I.D. #75-1321489

(214) 378-6675

March 25, 2021

Laverne Stanley
National Right to Work Legal Defense Foundation
8001 Braddock, Ste. 600
Springfield, VA 22160

Invoice # 27786

RE: Carter, Charlene/Transport Workers Union, Local 556

Professional Services:

3/09/2021 JW Receive and review court order granting Jeff Jennings'
motion to withdraw.

0.10 ✓	Amount ✓
\$375.00	\$37.50

For professional services rendered

\$37.50

Total New Charges

\$37.50

Previous Balance

\$1,237.50

3/09/2021 Payment

\$-937.50

Total Payments and Credits

\$-937.50

Balance Due

\$337.50

Payment is due upon receipt

Total New Charges	<u>\$300.00</u>
Previous Balance	\$937.50
Balance Due	<u><u>\$1,237.50</u></u>

Payment is due upon receipt

JENKINS & WATKINS, P.C.

Highland Park West
4300 MacArthur Avenue, Suite 165
Dallas, TX 75209-6524

TAX I.D. #75-1321489

(214) 378-6675

June 25, 2021

Laverne Stanley
National Right to Work Legal Defense Foundation
8001 Braddock, Ste. 600
Springfield, VA 22160

Invoice # 27879

RE: Carter, Charlene/Transport Workers Union, Local 556

Professional Services:

				<u>Amount</u>	
5/27/2021	JW	Review emails regarding discovery and regarding mediation; review second discovery requests to Local 556 and to Southwest.	0.20 \$375.00	\$75.00	✓
6/01/2021	JW	Receive and review mediation confirmation email and documents.	0.10 \$375.00	\$0.00	✓
6/02/2021	JW	Receive and review Southwest privilege log (.1); review correspondence with mediator regarding mediation attendance (.1).	0.20 \$375.00	\$75.00	✓
6/03/2021	JW	Review correspondence with counsel regarding confidentiality during mediation.	0.10 \$375.00	\$37.50	✓
6/04/2021	JW	Review Plaintiff's mediation position statement.	0.30 \$375.00	\$112.50	✓

6/04/2021	JW	Review emails between counsel regarding exchange of confidential information during mediation (no charge).	0.10 \$375.00	No Charge ✓
6/11/2021	JW	Review email correspondence to counsel and mediator regarding mediation demands.	0.10 \$375.00	\$37.50 ✓
6/25/2021	JW	Telephone call with Matt Gilliam regarding mediation update and current discovery issues; receive and review notice of appearance filed by Paulo McKeeby; receive and review email from Matt Gilliam and attached document production; receive and review Southwest's responses and objections to written discovery requests and supplemental document production.	0.60 \$375.00	\$225.00 ✓
For professional services rendered				<u>\$562.50</u> ✓
Total New Charges				<u>\$562.50</u> ✓
Previous Balance				\$2,962.50
Balance Due				<u><u>\$3,525.00</u></u>

Payment is due upon receipt

JENKINS & WATKINS, P.C.

Highland Park West
4300 MacArthur Avenue, Suite 165
Dallas, TX 75209-6524

TAX I.D. #75-1321489

(214) 378-6675

July 25, 2021

Laverne Stanley
National Right to Work Legal Defense Foundation
8001 Braddock, Ste. 600
Springfield, VA 22160

Invoice # 27903

RE: Carter, Charlene/Transport Workers Union, Local 556

Professional Services:

				<u>Amount</u>	
6/28/2021	JW	Receive and review TWU's written discovery responses.	0.10	\$37.50	✓
			\$375.00		
7/02/2021	JW	Review emails with counsel (.1); receive and review follow-up discovery requests to Southwest and to Local 556 (.1).	0.20	\$75.00	✓
			\$375.00		
7/13/2021	JW	Review email correspondence regarding TWU's document production and discovery responses.	0.10	\$37.50	✓
			\$375.00		
7/15/2021	JW	Review email correspondence from Adam Greenfield regarding discovery responses and document production; review Southwest responses and objections to Plaintiff's second request for production..	0.20	\$75.00	✓
			\$375.00		

For professional services rendered
\$225.00 ✓

Total New Charges	\$225.00
Previous Balance	\$3,525.00
6/29/2021 Payment	\$-2,962.50
Total Payments and Credits	<u>\$-2,962.50</u>
Balance Due	<u><u>\$787.50</u></u>

Payment is due upon receipt

JENKINS & WATKINS, P.C.

Highland Park West
4300 MacArthur Avenue, Suite 165
Dallas, TX 75209-6524

TAX I.D. #75-1321489

(214) 378-6675

September 25, 2021

Laverne Stanley
National Right to Work Legal Defense Foundation
8001 Braddock, Ste. 600
Springfield, VA 22160

Invoice # 27938

RE: Carter, Charlene/Transport Workers Union, Local 556

Current Fees for this Invoice	\$2,340.00
Current Expenses for this Invoice	<u>\$0.00</u>
Total Charges for this Invoice	\$2,340.00
Previous Balance	\$1,312.50
Payments/Credits	<u>\$0.00</u>
Total Now Due	<u><u>\$3,652.50</u></u>

APR 10 2022

Payment is due upon receipt.
Please reference the Invoice Number on your payment.

JENKINS & WATKINS, P.C.

Highland Park West
4300 MacArthur Avenue, Suite 165
Dallas, TX 75209-6524

TAX I.D. #75-1321489

(214) 378-6675

August 25, 2021

Laverne Stanley
National Right to Work Legal Defense Foundation
8001 Braddock, Ste. 600
Springfield, VA 22160

Invoice # 27922

RE: Carter, Charlene/Transport Workers Union, Local 556

Professional Services:

				<u>Amount</u>	
7/26/2021	JW	Emails with Matt Gilliam regarding filing under seal, and review of sealing procedures in scheduling order.	0.20 \$375.00	\$75.00	✓
7/27/2021	JW	Email with Matt Gilliam regarding filing of Southwest spreadsheet under seal; review emails with opposing counsel regarding filing of motion to compel.	0.20 \$375.00	\$75.00	✓
7/30/2021	JW	Review motion to seal, motion to compel discovery and brief in support; emails and telephone call with Matt Gilliam regarding motion to seal and motion to compel.	1.30 \$375.00	\$487.50	✓
8/02/2021	JW	Receive and review notice of filing of motion to compel. (No Charge)	0.10 \$375.00	No Charge	✓
8/02/2021	JW	Email with Matt Gilliam regarding TWU discovery extension request; review Southwest's responses and objections to third set of interrogatories and requests for production.	0.20 \$375.00	\$75.00	✓

8/04/2021	JW	Review email correspondence to Defendants regarding deficient discovery responses; telephone call with Matt Gilliam regarding discovery responses.	0.20 \$375.00	\$75.00	✓
8/05/2021	JW	Review email correspondence with Paulo McKeeby regarding discovery dispute.	0.10 \$375.00	\$37.50	✓
8/17/2021	JW	Review Southwest's response to motion to seal.	0.20 \$375.00	\$75.00	✓
8/18/2021	JW	Email correspondence with Matt Gilliam regarding advisability of replying to Southwest's response to motion to seal.	0.10 \$375.00	\$37.50	✓
8/23/2021	JW	Review draft of joint report on settlement status; email with Matt Gilliam.	0.20 \$375.00	\$75.00	✓
8/24/2021	JW	Review Southwest's filed affidavit in support of motion to seal documents.	0.10 \$375.00	\$37.50	✓
8/25/2021	JW	Review court order granting motion to seal and providing instructions on filing both public and sealed versions.	0.10 \$375.00	\$37.50	✓

For professional services rendered\$1,087.50

Total New Charges

\$1,087.50 ✓

Previous Balance

\$787.50

7/30/2021 Payment

\$-562.50

Total Payments and Credits

\$-562.50

Balance Due

\$1,312.50

JENKINS & WATKINS, P.C.

Highland Park West
4300 MacArthur Avenue, Suite 165
Dallas, TX 75209-6524

TAX I.D. #75-1321489

(214) 378-6675

September 25, 2021

Laverne Stanley
National Right to Work Legal Defense Foundation
8001 Braddock, Ste. 600
Springfield, VA 22160

Invoice # 27938

RE: Carter, Charlene/Transport Workers Union, Local 556

Professional Services:

				<u>Amount</u>	
8/26/2021	JW	Review filed joint status report on settlement.	0.10	\$37.50	✓
			\$375.00		
8/27/2021	JW	Review local rules and court order regarding summary judgment motions; email with Matt Gilliam regarding summary judgment motion procedures.	0.10	\$37.50	✓
			\$375.00		
8/31/2021	JW	Telephone call with Matt Gilliam regarding summary judgment motion filing procedures and logistics.	0.40	\$150.00	✓
			\$375.00		
8/31/2021	JW	Review applicable rules and procedures for filing non-documentary materials in support of summary judgment motion; prepare filing materials and transmittal correspondence to clerk.	0.90	\$337.50	✓
			\$375.00		
9/01/2021	JW	Telephone call with Matt Gilliam regarding motion for summary judgment filing rules and procedures (.5); review draft of brief in support of motion for summary judgment	1.60	\$600.00	✓
			\$375.00		

(.8); work on submission of video files (.1); email correspondence with Matt Gilliam regarding TWU request for motion to extend (.2).

9/02/2021	JW	Receive and review TWU's motion to extend MSJ deadline (.2); emails with Matt Gilliam regarding MSJ filings (.2); work on preparing submission of video in separate filing (.8); receive and review Southwest's motion for summary judgment, brief, and appendix in support (.8).	2.00 \$0.00	\$0.00 ✓
9/03/2021	JW	Attention to submission of video files for filing in connection with Motion for Summary Judgment; receive and review court order granting MSJ extension.	0.60 \$375.00	\$225.00 ✓
9/07/2021	JW	Telephone call with Matt Gilliam regarding filing motion to compel.	0.10 \$375.00	\$37.50 ✓
9/07/2021	JW	Receive and review Plaintiff's filed MSJ and supporting documents, and docket MSJ response dates.	0.40 \$375.00	\$150.00 ✓
9/08/2021	JW	Receive and review Carter's filed public and sealed version of second motion to compel, brief in support, and appendix in support; determine and calendar Southwest's response due date.	0.40 \$375.00	\$150.00 ✓
9/09/2021	JW	Receive and review filing confirmation of manually filed portion of MSJ Appendix.	0.10 \$375.00	\$37.50 ✓
9/10/2021	JW	Confer with Matt Gilliam regarding MSJ response arguments; receive and review SWA's supplemental motion for summary judgment, and TWU's motion for summary judgment, and brief and appendix in support.	0.80 \$375.00	\$300.00 ✓
9/15/2021	JW	Receive and review court order striking SWA's supplemental MSJ and court order of reference of motion to compel.	0.10 \$150.00	\$15.00 ✓

9/20/2021	JW	Emails with Matt Gilliam regarding MSJ response date extension.	0.10 \$375.00	\$37.50	✓
9/21/2021	JW	Telephone call with Matt Gilliam regarding MSJ responses; receive and review Southwest's draft and filed joint motion to extend MSJ response deadlines.	0.30 \$375.00	\$112.50	✓
9/22/2021	JW	Review local rules regarding MSJ response brief lengths, and emails with Matt Gilliam regarding same.	0.20 \$375.00	\$75.00	✓
9/23/2021	JW	Receive and review court order granting motion to extend MSJ response deadline.	0.10 \$375.00	\$37.50	✓
For professional services rendered				<u>\$2,340.00</u>	✓
Total New Charges				<u>\$2,340.00</u>	✓
Previous Balance				\$1,312.50	
Balance Due				<u><u>\$3,652.50</u></u>	

Payment is due upon receipt

JENKINS & WATKINS, P.C.

Highland Park West
4300 MacArthur Avenue, Suite 165
Dallas, TX 75209-6524

TAX I.D. #75-1321489

(214) 378-6675

August 25, 2021

Laverne Stanley
National Right to Work Legal Defense Foundation
8001 Braddock, Ste. 600
Springfield, VA 22160

Invoice # 27922

RE: Carter, Charlene/Transport Workers Union, Local 556

Current Fees for this Invoice	\$1,087.50
Current Expenses for this Invoice	<u>\$0.00</u>
Total Charges for this Invoice	\$1,087.50
Previous Balance	\$787.50
Payments/Credits	<u>\$-562.50</u>
Total Now Due	<u><u>\$1,312.50</u></u>

✓
APC's
MBJ
10/6/21

Payment is due upon receipt.
Please reference the Invoice Number on your payment.

JENKINS & WATKINS, P.C.

Highland Park West
4300 MacArthur Avenue, Suite 165
Dallas, TX 75209-6524

TAX I.D. #75-1321489

(214) 378-6675

July 25, 2021

Laverne Stanley
National Right to Work Legal Defense Foundation
8001 Braddock, Ste. 600
Springfield, VA 22160

Invoice # 27903

RE: Carter, Charlene/Transport Workers Union, Local 556

Current Fees for this Invoice	\$225.00
Current Expenses for this Invoice	<u>\$0.00</u>
Total Charges for this Invoice	\$225.00
Previous Balance	\$3,525.00
Payments/Credits	<u>\$-2,962.50</u>
Total Now Due	<u><u>\$787.50</u></u>

APR 10/6/21

*Payment is due upon receipt.
Please reference the Invoice Number on your payment.*

JENKINS & WATKINS, P.C.

Highland Park West
4300 MacArthur Avenue, Suite 165
Dallas, TX 75209-6524

TAX I.D. #75-1321489

(214) 378-6675

October 25, 2021

Laverne Stanley
National Right to Work Legal Defense Foundation
8001 Braddock, Ste. 600
Springfield, VA 22160

Invoice #27963

RE: Carter, Charlene/Transport Workers Union, Local 556

Professional Services:

				<u>Amount</u>	
10/04/2021	JW	Research and review rules regarding redaction of sensitive information from filings, and email with Matt Gilliam regarding same.	0.30 \$375.00	\$112.50	✓
10/04/2021	JW	Review draft of response to MSJ and brief in support; telephone call with Matt Gilliam to discuss suggestions for response brief.	1.00 \$375.00	\$375.00	✓
10/04/2021	JW	Receive and review court order regarding Southwest's leave to file supplemental MSJ; receive and review Southwest's response to motion to file under seal and supporting declaration.	0.20 \$375.00	\$75.00	✓
10/05/2021	JW	Receive and review Southwest's and TWU's responses and briefs to Carter's motion for summary judgment; docket reply due date.	0.60 \$375.00	\$225.00	✓

10/06/2021	JW	Receive and review court order regarding extension of response date for motion to compel and setting hearing on motion; calendar deadlines regarding motion and upcoming hearing.	0.20 \$375.00	\$75.00 ✓
10/07/2021	JW	Receive and review Southwest's unopposed motion for leave to file supplemental MSJ and attachment.	0.10 \$375.00	\$37.50 ✓
10/11/2021	JW	Receive and review court order granting Southwest's motion for leave to file supplemental MSJ.	0.10 \$375.00	\$37.50 ✓
10/13/2021	JW	Review Southwest's filed response to Carter's second motion to compel and Southwest's appendix in support of response.	0.50 \$375.00	\$187.50 ✓
10/14/2021	JW	Review Southwest's filed corrected or supplemental motion for summary judgment.	0.10 \$375.00	\$37.50 ✓
10/18/2021	JW	Review drafts of reply briefs in support of motion for summary judgment.	0.80 \$375.00	\$300.00 ✓
10/19/2021	JW	Receive and review Plaintiff's filed MSJ reply briefs (.1); receive and review TWU's and Southwest's filed MSJ reply briefs. (.4).	0.50 \$375.00	\$187.50 ✓
10/21/2021	JW	Telephone call with Matt Gilliam regarding SWA's request for trial continuance.	0.20 \$375.00	\$75.00 ✓
10/25/2021	JW	Email correspondence with Matt Gilliam regarding discovery supplementation issues; review draft of joint motion to extend pretrial and trial deadlines.	0.30 \$375.00	\$112.50 ✓
For professional services rendered				<u>\$1,837.50</u> ✓
Total New Charges				<u>\$1,837.50</u> ✓
Previous Balance				\$3,652.50

10/21/2021 Payment	\$-225.00
10/21/2021 Payment	\$-3,427.50
Total Payments and Credits	<u>\$-3,652.50</u>
Balance Due	<u><u>\$1,837.50</u></u>

Payment is due upon receipt

JENKINS & WATKINS, P.C.

Highland Park West
4300 MacArthur Avenue, Suite 165
Dallas, TX 75209-6524

TAX I.D. #75-1321489

(214) 378-6675

November 25, 2021

Laverne Stanley
National Right to Work Legal Defense Foundation
8001 Braddock, Ste. 600
Springfield, VA 22160

Invoice # 27984

RE: Carter, Charlene/Transport Workers Union, Local 556

Current Fees for this Invoice	\$300.00
Current Expenses for this Invoice	<u>\$0.00</u>
Total Charges for this Invoice	\$300.00
Previous Balance	\$1,837.50
Payments/Credits	<u>\$0.00</u>
Total Now Due	<u>\$2,137.50</u>

*Payment is due upon receipt.
Please reference the Invoice Number on your payment.*

App'd by
MBR
12/10/21

Total
App'd by
MBR

JENKINS & WATKINS, P.C.

Highland Park West
 4300 MacArthur Avenue, Suite 165
 Dallas, TX 75209-6524

TAX I.D. #75-1321489

(214) 378-6675

November 25, 2021

Laverne Stanley
 National Right to Work Legal Defense Foundation
 8001 Braddock, Ste. 600
 Springfield, VA 22160

Invoice # 27984

RE: Carter, Charlene/Transport Workers Union, Local 556

Professional Services:

				<u>Amount</u>	
10/27/2021	JW	Review second draft of motion for continuance of trial setting, and correspondence with Matt Gilliam regarding same; receive and review filed motion to continuance.	0.30 \$375.00	\$112.50	✓
11/04/2021	JW	Receive and review amended scheduling order and update docket deadlines.	0.10 \$375.00	\$37.50	✓
11/06/2021	JW	Check status of upcoming hearing on motion to compel, and email with Matt Gilliam regarding logistics for handling of hearing.	0.10 \$375.00	\$37.50	✓
11/16/2021	JW	Receive and review court order regarding hearing on motion to compel. (No Charge)	0.10 \$375.00	No Charge	✓
11/18/2021	JW	Receive and review court order canceling hearing on motion to compel. (No Charge)	0.10 \$375.00	No Charge	✓

11/19/2021 JW Receive and review court order on second motion to
compel.

0.30
\$375.00

\$112.50 ✓

For professional services rendered

\$300.00 ✓

Total New Charges

\$300.00

Previous Balance

\$1,837.50

Balance Due

\$2,137.50

Payment is due upon receipt

JENKINS & WATKINS, P.C.

Highland Park West
4300 MacArthur Avenue, Suite 165
Dallas, TX 75209-6524

TAX I.D. #75-1321489

(214) 378-6675

December 25, 2021

Laverne Stanley
National Right to Work Legal Defense Foundation
8001 Braddock, Ste. 600
Springfield, VA 22160

Invoice # 28008

RE: Carter, Charlene/Transport Workers Union, Local 556

Current Fees for this Invoice	\$112.50
Current Expenses for this Invoice	<u>\$0.00</u>
Total Charges for this Invoice	\$112.50
Previous Balance	\$2,137.50
Payments/Credits	<u>\$-2,137.50</u>
Total Now Due	<u>\$112.50</u> ✓

*Payment is due upon receipt.
Please reference the Invoice Number on your payment.*

OK
MBH
2/18/22

JENKINS & WATKINS, P.C.

Highland Park West
 4300 MacArthur Avenue, Suite 165
 Dallas, TX 75209-6524

TAX I.D. #75-1321489

(214) 378-6675

December 25, 2021

Laverne Stanley
 National Right to Work Legal Defense Foundation
 8001 Braddock, Ste. 600
 Springfield, VA 22160

Invoice # 28008

RE: Carter, Charlene/Transport Workers Union, Local 556

Professional Services:

			Amount	
12/02/2021	JW	Telephone call with Matt Gilliam regarding issue of appeal of magistrate judge's order on motion to compel.	0.30	\$112.50 ✓
			\$375.00	

For professional services rendered

\$112.50

Total New Charges

\$112.50

Previous Balance

\$2,137.50

12/25/2021 Payment

\$-1,837.50

12/25/2021 Payment

\$-300.00

Total Payments and Credits

\$-2,137.50

Balance Due

\$112.50

JENKINS & WATKINS, P.C.

Highland Park West
4300 MacArthur Avenue, Suite 165
Dallas, TX 75209-6524

TAX I.D. #75-1321489

(214) 378-6675

October 25, 2021

Laverne Stanley
National Right to Work Legal Defense Foundation
8001 Braddock, Ste. 600
Springfield, VA 22160

Invoice # 27963

RE: Carter, Charlene/Transport Workers Union, Local 556

Current Fees for this Invoice	\$1,837.50
Current Expenses for this Invoice	<u>\$0.00</u>
Total Charges for this Invoice	\$1,837.50
Previous Balance	\$3,652.50
Payments/Credits	<u>\$-3,652.50</u>
Total Now Due	<u><u>\$1,837.50</u></u>

*Payment is due upon receipt.
Please reference the Invoice Number on your payment.*

App'd
by
MBH
12/10/21
Included
in total
on
Nov 25
invoice



Jenkins & Watkins, P.C.

25 Highland Park Village, Ste. 100-359
Dallas, TX 75205-2789
(214) 378-6675

INVOICE

Invoice # 28062
Date: 02/25/2022

Laverne Stanley
National Right to Work Legal Defense Foundation
8001 Braddock, Ste. 600
Springfield, VA 22160

Carter, Charlene/Transport Workers Union, Local 556

Date	Type	Timekeeper	Description	Quantity	Rate	Total
12/25/2021	Service	JW	Outstanding Balance Forward for Invoice #28008	1.00	\$112.50	\$112.50
01/31/2022	Service	JW	Telephone call with Matt Gilliam regarding expert designations and court orders (.4); review expert designation requirement and provide biographical information for attorney-fee expert designation (.1); review court orders regarding motion to amend/ correct and regarding motions to seal (.4); review draft of Rule 26(a)(2) expert designation (.1).	1.00	\$375.00	\$375.00
02/01/2022	Service	JW	Receive and review corrected order regarding motion to seal, and email correspondence with Matt Gilliam regarding same (.2); receive and review Plaintiff's designation of expert witnesses (.1).	0.30	\$375.00	\$112.50
02/04/2022	Service	JW	Receive and review redacted exhibits from Southwest Airlines per Court Order.	0.30	\$375.00	\$112.50
02/07/2022	Service	JW	Review correspondence with Southwest counsel regarding exhibits redactions.	0.10	\$375.00	\$37.50
02/08/2022	Service	JW	Follow up on status of redactions; review court order for instructions; review correspondence with TWU and telephone call with Matt Gilliam regarding redactions and options for handling.	0.60	\$375.00	\$225.00

Perd 2/24

✓

✓

✓

✓

✓

02/09/2022	Service	JW	Telephone call with Matt Gilliam and review email correspondence between counsel regarding compliance with court order regarding motion to seal; receive and review court email with instructions summary judgment motion.	0.60	\$375.00	\$225.00	✓
02/14/2022	Service	JW	Review Southwest's proposed motion to stay trial and pretrial deadlines and multiple email correspondence with Matt Gilliam and opposing counsel regarding same; review drafts of notice regarding redactions and email correspondence with Matt Gilliam regarding same.	0.60	\$375.00	\$225.00	✓
02/15/2022	Service	JW	Receive and review Southwest's unopposed motion to extend trial setting and deadlines and proposed order; review email correspondence with mediator regarding case status.	0.20	\$375.00	\$75.00	✓
02/17/2022	Service	JW	Receive and review re-filed motion for summary judgment briefs and appendices per court order, and notice to court regarding compliance with order.	0.30	\$375.00	\$112.50	✓
02/24/2022	Service	JW	Review and calendar new trial date and pretrial deadline in court order.	0.30	\$375.00	\$112.50	✓

Subtotal \$1,725.00

Total \$1,725.00

Detailed Statement of Account

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
28062	03/25/2022	\$1,725.00	\$0.00	\$1,725.00
Outstanding Balance				\$1,725.00
Total Amount Outstanding				\$1,725.00

Payment is due upon receipt. Please make all payments payable to Jenkins & Watkins, P.C.

Please make a note of our new mailing address - effective as of May 1, 2022:

25 Highland Park Village, Ste. 100-359
Dallas, TX 75205-2789

Pay \$1,612.50
Already paid
\$112.50 from
12/35
- MBH
3/8/22



Jenkins & Watkins, P.C.

25 Highland Park Village, Ste. 100-359
Dallas, TX 75205-2789
(214) 378-6675

INVOICE

Invoice # 28075
Billing for 02/26/2022 to 03/25/2022
Date: 03/25/2022

Laverne Stanley
National Right to Work Legal Defense Foundation
8001 Braddock, Ste. 600
Springfield, VA 22160

Carter, Charlene/Transport Workers Union, Local 556

Date	Type	Timekeeper	Description	Quantity	Rate	Total
03/01/2022	Service	JW	Review court order regarding Southwest's summary judgment motion.	0.10	\$375.00	\$37.50
Subtotal						\$37.50
Total						\$37.50

Statement of Account

Outstanding Balance		New Charges		Total Balance
\$0.00	+	\$37.50	=	\$37.50

MBH
App'd
4/14/22

Payment is due upon receipt. Please make all payments payable to Jenkins & Watkins, P.C.

Please make a note of our new mailing address - effective as of May 1, 2022:

**25 Highland Park Village, Ste. 100-359
Dallas, TX 75205-2789**